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DOCUMENT RESUME

ED 201 869 CE 028 988

AUTHOR	Goggans, E. Patricia; Lawrence, Dorothy
TITLE	Equality in Vocational Programs. Administrative Reference.
INSTITUTION	Colorado State Board for Community Colleges and Occupational Education, Denver. Div. of Occupational Education.
PUB DATE	[80]
NOTE	164p.: Some pages will not reproduce well due to small print. For related documents see CE 028 989-990.
EDRS PRICE	MF01/PC07 Plus Postage.
DESCRIPTORS	Access to Education; Affirmative Action; Background; Bibliographies; Educational Legislation; Employed Women; Employment Opportunities; *Equal Education; Females; Males; Nontraditional Occupations; *Policy Formation; Program Design; Program Development; School Administration; School Districts; *School Policy; Secondary Education; *Sex Bias; *Sex Fairness; Sex Role; Sex Stereotypes; Student Recruitment; Teacher Recruitment; Two Year Colleges; *Vocational Education
IDENTIFIERS	*Colorado; Office for Civil Rights; Title IX Education Amendments 1972; Vocational Education Amendments 1976

ABSTRACT

This document is one of three publications designed to establish guidelines for the elimination of sex bias and sex stereotyping and the establishment of sex fairness in vocational education programs in Colorado. As an administrative reference, it provides background material about the problem and a plan of action for correcting it for school and school district administrators. The ten sections of the report cover the following topics: definitions; a rational for sex equity; legislative overview, including provisions of Title II Education Amendments 1976 and Title IX Education Amendments 1972, Public Law 94-482, Office of Civil Rights-Federal Register March 21, 1979, and a quota system approved by a court; underuse of males and females in vocational education throughout Colorado; policies, goals, and objectives; action planning; tools for assessment; developing staff/student recruitment plans; resource lists (bibliographies); and references. (KC)

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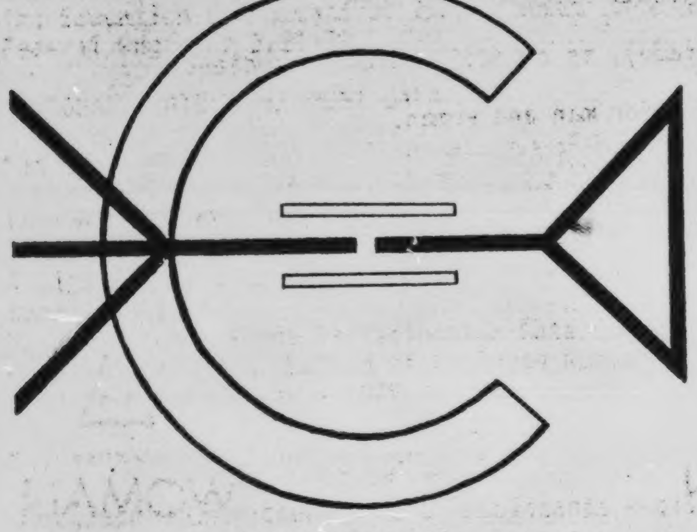
EQUALITY IN VOCATIONAL PROGRAMS



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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION DIVISION
1979-80
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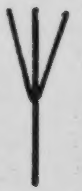
839-3011

General Reference
7-1-79-02

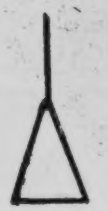
ABOUT THE COVER

"C" signifies the State of Colorado.

The symbol, superimposed upon the "C" (Colorado), is a modification of ancient symbols for man and woman.



MAN



WOMAN

The bars above and below the combined symbols for man and woman signify the mathematical symbol which connotes equal value.

Acknowledgment: Mrs. E. Patricia Goggans drafted the original copy of this publication.

Mrs. Kathy Vahling and the Word Processing Center staff for technical assistance, 1979-80.

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ADMINISTRATIVE REFERENCE
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(7/27/79)

PICTORIAL

DEFINITIONS

I

"The essential difference between the sexes will never disappear; nature will see to that. The essential attraction between man and woman will never disappear; nature will see to that. The school's and society's job is to provide an atmosphere in which each male and female can develop as a person for the benefit of everyone."

--June Henrich

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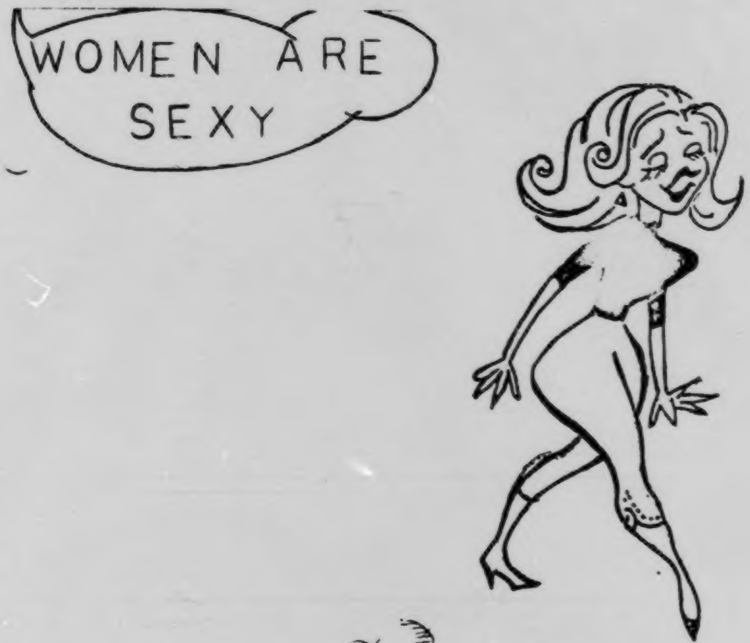
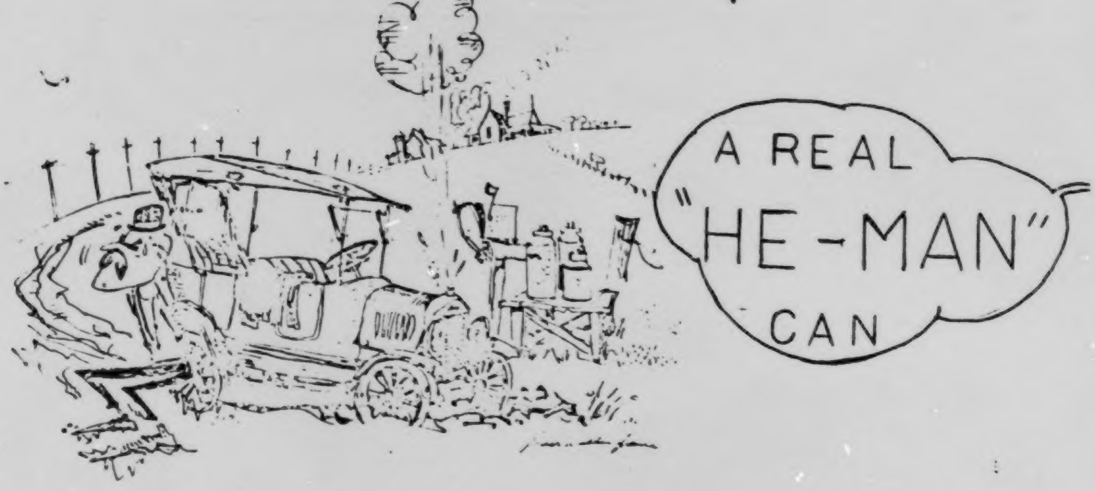
SEX STEREOTYPING

ATTRIBUTING BEHAVIORS
ABILITIES
INTERESTS
VALUES
ROLES

TO A PERSON(S) ON THE BASIS OF SEX

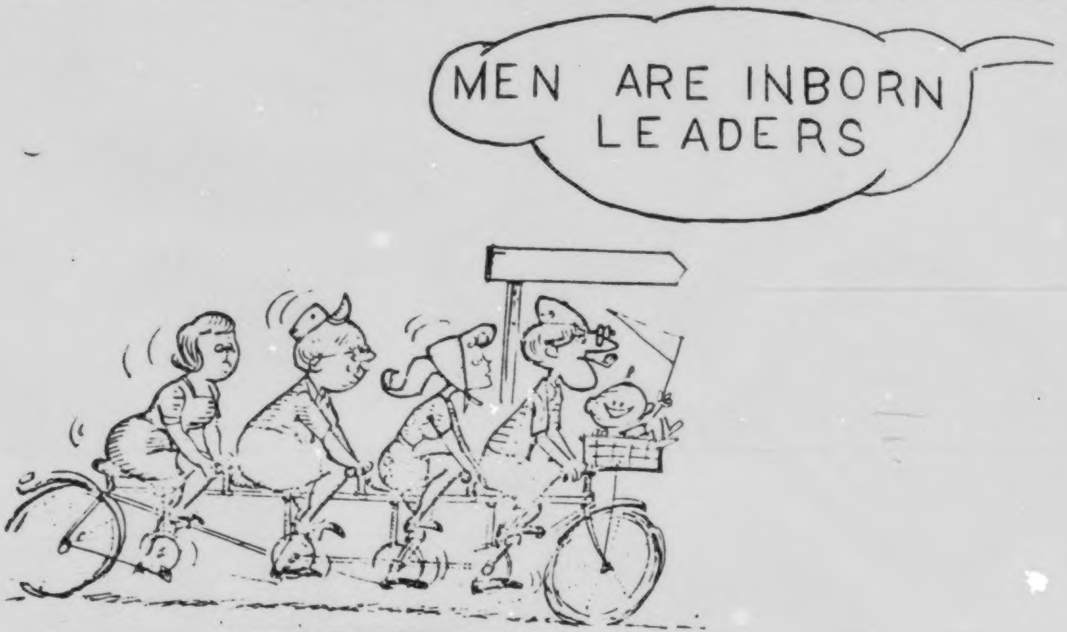

WOMEN ARE SEXY

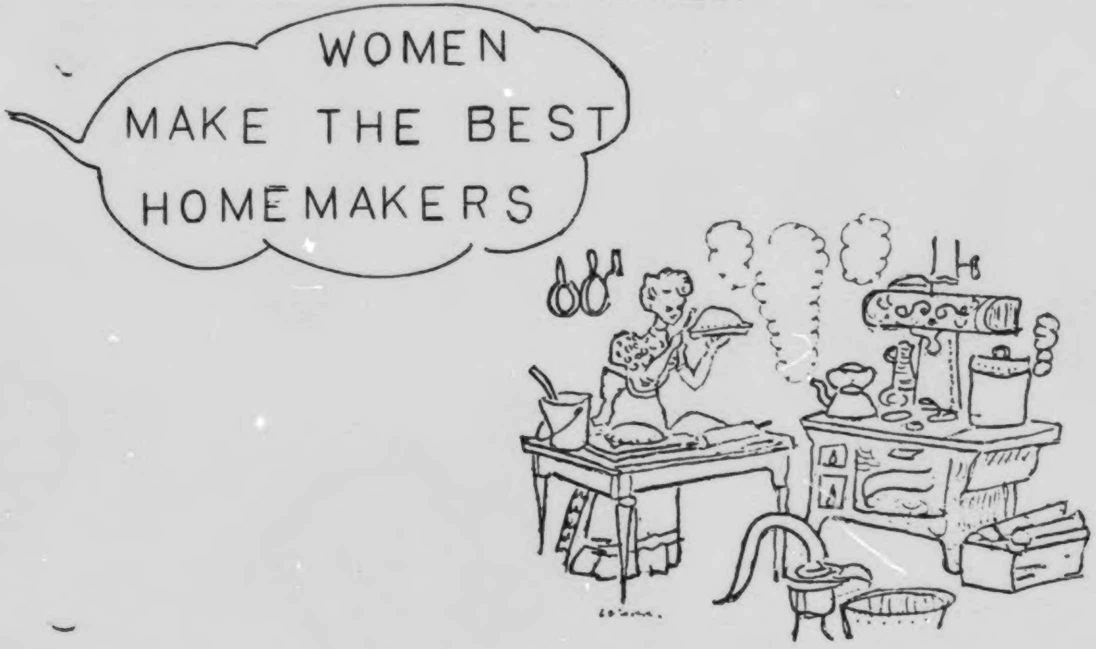

A REAL "HE-MAN" CAN

SEX STEREOTYPING

SEX BIAS: BEHAVIORS

RESULTING FROM THE
ASSUMPTION ONE SEX
IS SUPERIOR TO THE
OTHER.


MEN ARE INBORN LEADERS


WOMEN MAKE THE BEST HOMEMAKERS

SEX BIAS

SEX DISCRIMINATION

ANY

ACTION WHICH LIMITS OR DENIES

A PERSON(S)

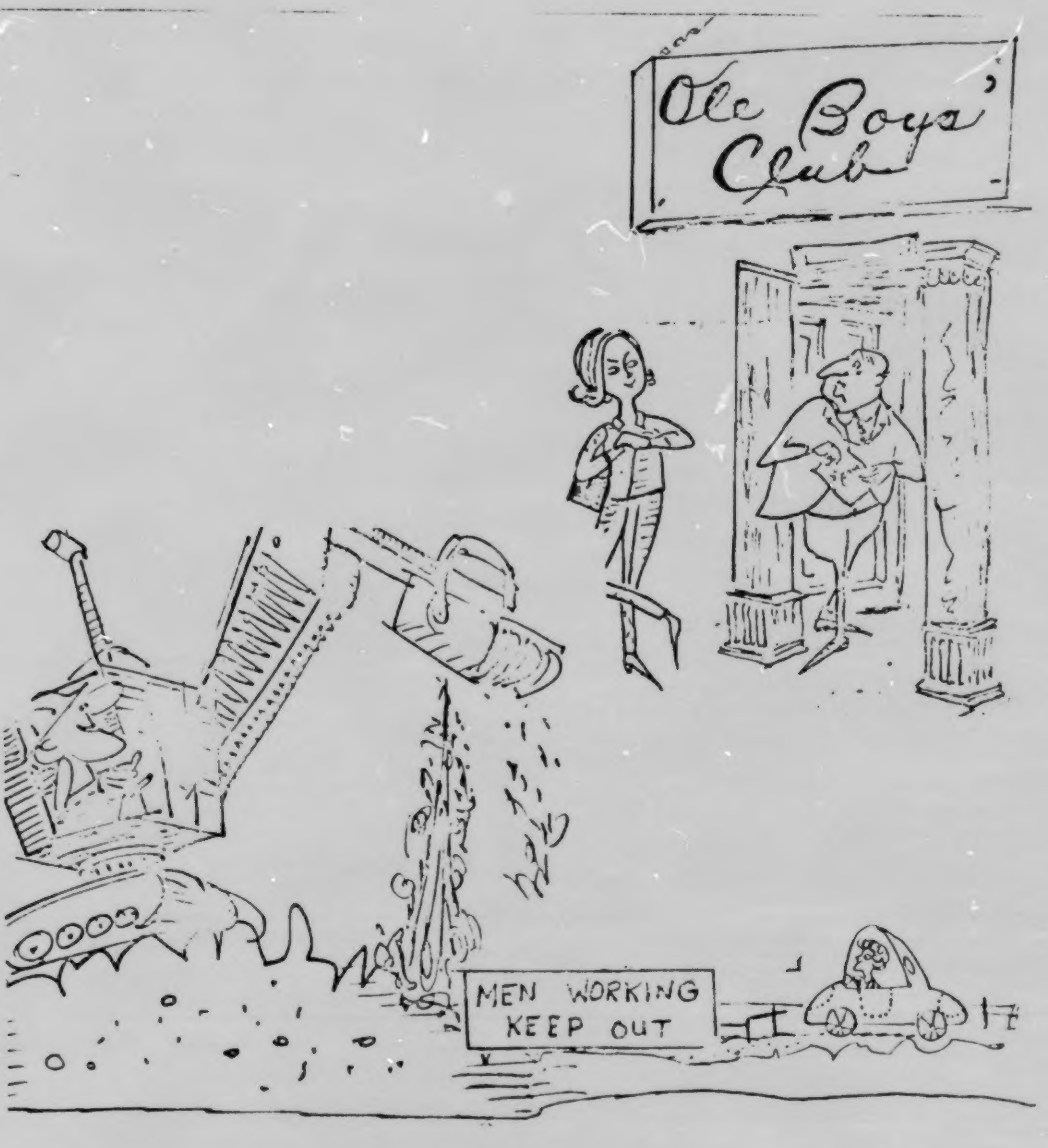
OPPORTUNITIES

PRIVILEGES

ROLES

REWARDS

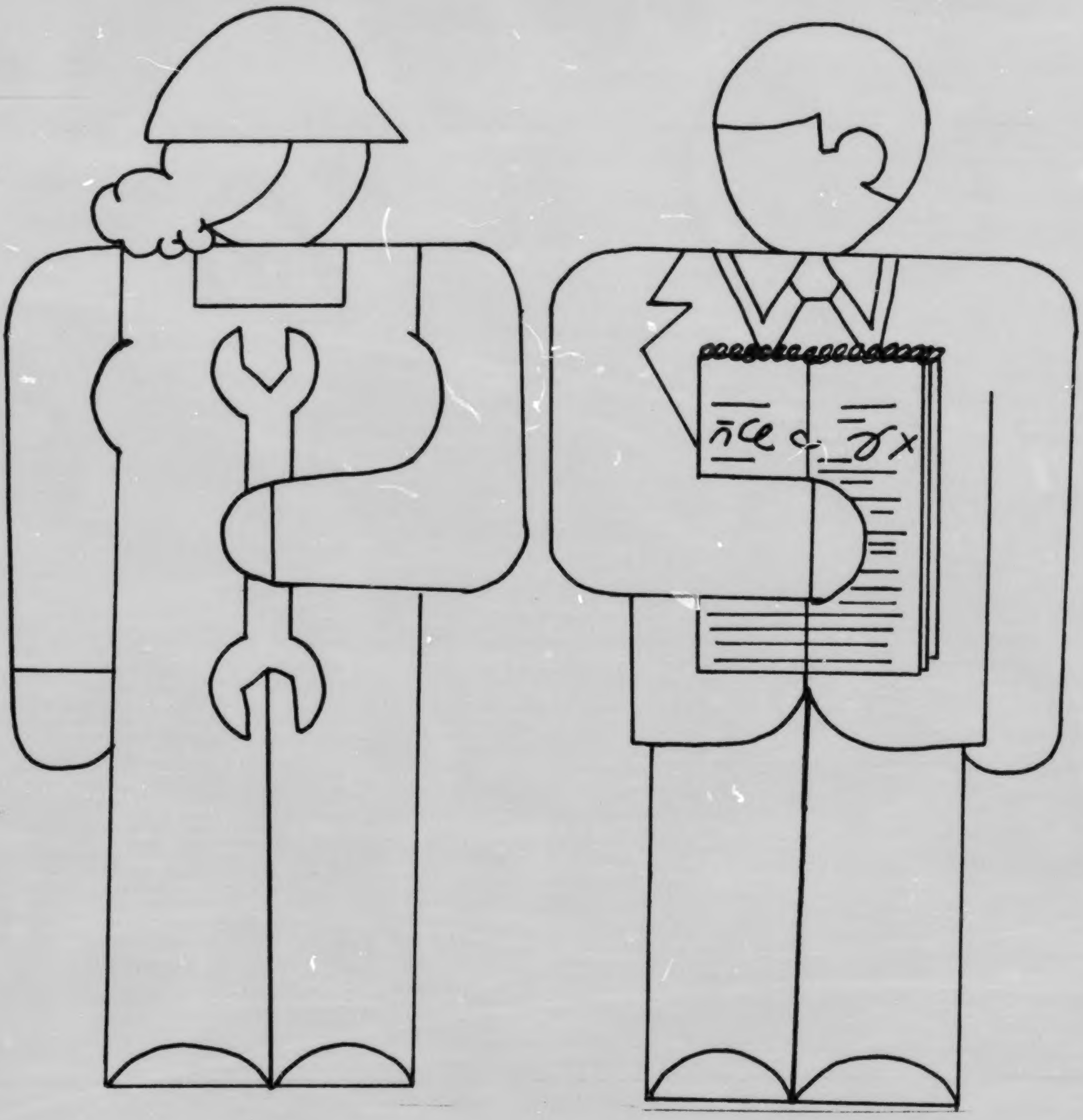
ON BASIS OF SEX


Ole Boys' Club
MEN WORKING
KEEP OUT

SEX

DISCRIMINATION

-6



NONTRADITIONAL OCCUPATIONS

Nontraditional occupations are those which have underrepresentation of one sex, in relationship to the available pool. (See section on underutilization.)

Nontraditional Occupations for Females:

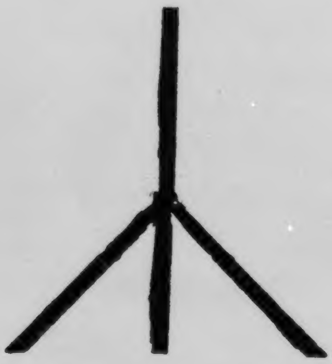
Agriculture
Trade and Industrial
Technical
Administration/Management
Research
Curriculum
Guidance and Job Development

Nontraditional Occupations for Males:

-Health Occupations
-Home Economics
-Consumer and Homemaking
-Secretarial Science

SOME RATIONALE FOR EQUITY

II



MALENESS

THE HAZARDS OF BEING MALE

"The traditional blueprint for masculinity is a blueprint for self-destruction," psychologist Herb Goldberg told those attending the Iowa Title IX conference held in Iowa City in December.

The traditional male-female relationship breeds guilt in the male and rage in the female, he told a banquet audience of 200.

"Women have much to be legitimately enraged about. They have been ripped off of their autonomy, assertiveness and sexuality by the gender dance. But men have been ripped off of everything about them that is human and makes life an expansive, pleasurable experience rather than one of desperation, constriction and compulsive proving."

Goldberg, author of the book THE HAZARDS OF BEING MALE, said, "It's no accident that in 1920 there was a one year gap between male and female longevity, and that fifty years later the gap has increased to eight years and the disparity is increasing."

Men die from all major diseases - from cancer to pulmonary and circulatory diseases - at rates significantly higher than women, he continued. They are the victims of most crimes, and commit suicide three times as often as women.

Boys are raised primarily by women, he explained, and although as children they identify most with women, they are expected to magically grow up "all male." They try to do this, he said, by denying or repressing parts of themselves which might lead to their being considered feminine.

They deny emotions in favor of steely rationality, dependency in favor of exaggerated independence and self-reliance, and passivity in favor of hyperactivity. They approach pain as a challenge instead of a warning signal from their bodies, he continued. They refuse to reach out to others for help, affection, or even physical contact.

Men, for the sake of their own survival, must learn to accept traditionally feminine traits within themselves, Goldberg emphasized. "They've got to stop trying to prove they're not what they are."

Men need to break away from the traditional destructive stereotype of masculinity, Goldberg continued. They need to stop repressing their emotions and needs, and to learn to reach out for affection, support and help. They need to learn to respect and pay attention to their bodies' signals, to allow themselves to rest and relax, and to stop eating as though they were warriors going on a three-week hunt.

And, he added, women, in addition to breaking away from the stereotypes of femininity, need to learn to stop reinforcing destruction, stereotypically masculine traits in men.

Article reprinted from: CHOICES, published by Midwest Sex Desegregation Assistance Center, February 1979, Vol. 1, No. 1.

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(6/11/79)

(The comments below are excerpts from one of several articles selected for Men's Pages, a publication of the Men's Resource Center in Portland, Oregon 1976.)

A MAN'S VIEW

By Andy Hawley

The fate of one sex is inseparable from that of the other, and any movement seeking to shatter one set of stereotypes must acknowledge the influence of the opposite stereotypes. So, it seems imperative that the prevailing assumptions about masculinity be exposed if we are to set free both the oppressors and the oppressed.

What are the prevailing myths about masculinity in our society? Masculinity seems to be synonymous with:

-- rugged individualism.
-- reason and utility as opposed to emotion and beauty, the latter being feminine, i.e., secondary.
-- not showing emotion; being "cool" and ironic.
-- not having to explain yourself to anyone or to take others' feelings into account.
-- not making mistakes, or at least not admitting them.
-- making the most difficult decisions almost automatically, without thinking twice and certainly without consulting anyone else.
-- resolving conflicts through violence.
-- commanding and then expecting to be obeyed, especially where women are concerned.
-- taking what you want sexually when you want it, and disregarding her.

In short, masculinity means inherent superiority, hence autonomy, in all important matters. Weakness, doubt, discussion and compromise are signs of failure. This James Bond concept of masculinity makes a lot of trouble for all of us. It fosters anxiety in men, since it is unattainable and, where partially achieved, it is destructive rather than fulfilling. It is a direct insult to women, since it is based fundamentally on a doctrine of sexual supremacy. Indirectly, the fallacious view of masculinity makes women the targets of bitterness for men who hate and fear feminity in themselves--as happens to men who are raised by women, away from men, and yet are pressured to be masculine.

Femininity in women becomes a necessary evil; in men it is evil period. (This fear of being feminine, combined with the greater or lesser homoeroticism which is natural in all men, leads into an even stronger fear of being homosexual--which of course accelerates the whole vicious cycle of confusion, guilt, irritability and hostility.)

If everyone, women and men, could see that the whole business of sex identity is a red herring, then men could stop reinforcing all the wrong attitudes in each other through verbal cock-fighting, abusing women in front of other men, and ritual flirtation (the latter goes for women, too).

Our desire for social acceptance and our secret, lonely sense of being unable (as, luckily, most of us are) to live up to the male stereotype, have blinded us to the nature of our real needs and limits and our real opportunities for boys we were taught that our basic and ultimate motives are selfishly anti-social; moreover we, like our society, are confused and ambivalent about whether or not that's a good thing. In other words, we are a mixture of Puritan and hedonist. We are sheep who dream of being wolves, and who awake to feel self-hate at our secret wickedness and/or self-contempt at our timidity.

Thus women, for men, are alternately angels and slaves, to be worshipped one minute and spurned and exploited the next, but seldom treated as equals.

What would happen if men rejected the male stereotype and acknowledged the value of openness, humility, discussion, consideration, cooperation, and compromise, along with honest, respectful disagreement and conflict?

We would trade our impossible standards and false self-image for realistic standards and real self-respect.

We would trade the dominance/submission syndrome for woman/man relationships that assume equality, honesty and good faith. We have to help each other become the kind of people we can love.

These "changes of heart" are crucial. But change in consciousness must be accompanied (not preceded) by change in institutions.

Would men's and women's liberation of the sort I've described destroy or change the traditional American family? I think so. It is an institution with many drawbacks. While privacy and the sense that a spouse or child has of being special should not be valued lightly, considerations of efficiency and economy and of exposure to the difficulties and opportunities inherent in larger groups living and working together make it a good idea to experiment with some "communal" kinds of arrangement. Not only might it be possible to reduce the individual housework, cooking and childcare load, for examples, but some amount of group living affords intimate contact with a variety of people, multiple perspectives on oneself, and experience in dealing with group conflicts and decisions. This is a good way, especially for children, to break the cycle of selfish individualism and to move toward the sense of community that we need.

Whether or not we make such experiments, the following changes in traditional family patterns seem to follow necessarily from liberated consciousness.

Women must be seriously involved in projects outside the home that are as challenging, broadening and socially consequential as any that men engage in. Whether or not this takes the form of a paying job is beside the point. But there is no reason why the woman's work might not be actually more remunerative than her husband's--the matter of financial support and the matter of socially useful work are not essentially related--at least, not in this society.

Men, by the same token, should take direct responsibility for a corresponding amount of the housekeeping chores. This is not a matter of rigid formulas; the point is that household chores need doing, there is no good reason the woman should have to do more of them than the man, and there are excellent reasons why she shouldn't. In the ideal society, of course, there may be women, just as there may be men, who really like there may be men, who really like housework and prefer to do it, but our goal is to establish a situation where men and women can approach this question without prejudices and with enough diverse experience and models to make an educated, individual choice.

The father should accept a more equal proportion of child-care responsibilities. This is even more important for the children than it is for the father and mother. Such an arrangement will help build good attitudes in the child about men's and women's roles, and will help eliminate the specialized "bedroom community" with its tired, estranged weekend fathers and its bored, resentful and slavishly ignorant housewife-mothers--hardly a good childrearing environment.

Lastly--and here many will draw the line--women and men who accept the principle of equality must, if they are serious about it, become political agitators, constantly struggling to change all the institutions in their lives. Schools, business, church, family . . . all insult, exploit and oppress women. This system is so destructive of everyone it touches--and it touches everyone--that it must be destroyed. Oppression of women is so basic to our society that its destruction will constitute no less than a revolution.

Many draw the line at trying to change not only themselves but society. Considering the ridicule, hostility and resistance this women's struggle is encountering and will continue to encounter, that is understandable. But it is a vain hope. Personal liberation alone is impossible; escape is impossible. We need each other's support in taking the material and emotional risks involved in such struggles. Those risks can help give meaning and an air of reality to our relatively luxurious lives.

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SOME DAMAGING EFFECTS OF SEX STEREOTYPING
ON BOYS AND MEN

Compiled by Feminists Northwest

A. LOSS OF PERSONALITY AND WORK OPTIONS

1. The damage of stereotyping is even more irreparable for the boy than for the girl. When boys learn stereotyped male behavior there is a 20 percent better chance that it will stay with them for life than when girls learn stereotyped behavior. (P.H. Mussen, "Some Antecedents and Consequents of Masculine Sex-Typing in Adolescent Boys." Psychological Monographs, vol. 75, no. 2 (1961); and P. H. Mussen, "Long-term Consequents of Masculinity on Interests in Adolescence," Journal of Consulting Psychology, vol. 26 (1962), 435-440.)

2. Demands that boys conform to social notions of what is manly come much earlier and are reinforced with much more vigor than similar attitudes with respect to girls. Several research studies, using preschool children as their subjects, indicate that boys are aware of what is expected of them because they are boys and restrict their interests and activities to what is suitably "masculine" in kindergarten, while girls amble gradually in the direction of "feminine" patterns for five more years. (Ruth Hartley, "Sex-Role Pressures and the Socialization of the Male Child," in Judith Stacey et al. (eds.), And Jill Came Tumbling After: Sexism in American Education, New York: Dell, 1974, 185-198.)

3. Most boys build expectations that are higher than their achievements. ...Boys who score high on sex-appropriate behavior (possessing masculine outlook and behavior) also score highest in anxiety .... Striving to maintain a masculine role is for the boy stressful enough to be associated with manifest anxiety. (Susan W. Gray, "Masculinity-Femininity in Relation to Anxiety and Social Acceptance, Child Development, vol. 28, no. 2 (June 1957), 203-214.)

4. Because of the relative absence of fathers from boys' experience ... the elementary aged boy looks to his peers to fill in the gaps in his information about his role as a male. Since his peers have no better sources of information than he has, all they can do is to pool the impressions and anxieties they derive from the media and their early training. Thus we find over-emphasis on physical strength and athletic skills with almost complete omission of tender feelings or acceptance of responsibility toward those that are weaker. (Adapted from Ruth Hartley, op.cit.)

5. Six volumes of studies document that violence in American society is taught, learned and acted upon. Boys are actually encouraged to be aggressive by parents while girls are not. Almost all TV models encourage aggression in men. Childhood aggression predictably results in continued undisguised aggression when boys become men. (Warren Farrell, The Liberated Man, N.Y.: Bantam Books, 1974, p. 43; and Robert Liebert, "Television and Social Learning: Some Relationships between Viewing Violence and Behaving Aggressively" (Overview) in Television and Social Behavior: A Report To The Surgeon General from the Surgeon General's Scientific Advisory Committee on Television and Social Behavior, vols. 1-5, Washington, D.C.: National Institute of Mental Health, U. S. Govt. Printing Office, 1972).

6. Basically the male stereotype discourages males from speaking openly with one another about their fears, anxieties, and weaknesses. It fosters intellectualizing, bravado, and competitiveness among males, all of which are directly antithetical to more intimate personal exchanges. (Janet Saltzman Chafetz, Masculine/Feminine or Human? Itasca, Ill: F. E. Peacock Publisher, Inc., 1974, p. 165.)

7. Most boys recognize they cannot prove themselves on all levels.... But they must still choose between two basic images of what a man is and can be -- images which are apparent from both children's books and numerous other sources. One image is the "physical striving man" and the other, the "job striving" man. (Warren Farrell, op.cit. pp. 37-38.)

8. There are some further costs of the masculine role. It is well known that males have a life expectancy that is shorter by several years than that of females, and that there is a much higher mortality rate for males between the specific ages of 18 and 65 than for females. Some of the reasons for this are probably related to sex role phenomena. First, males suffer more accidental deaths in sports, on dangerous vehicles like motorcycles, and through violence. Part of the definition of masculinity is personal bravery and adventuresomeness.

   Over and above accidental deaths are deaths from diseases that probably reflect, in part, the masculine emphasis on competition, success, and productivity. The pressure on males to "succeed" in a highly competitive world of work creates tremendous stress; in the final analysis, few males can ever sit back and say "I've arrived; I am a success; now I can relax."

   Among the large numbers of males doing less competitive but more repetitious labor, the pressure to persist day in, day out, year after year, in highly alienating work results from the sex role requirement that they provide for their families the best they possibly can in material terms. Heart attacks, strokes, high blood pressure, and other circulatory illnesses probably result in part from such pressures. They undoubtedly also contribute to the much higher rates of alcohol and drug abuse among males, which in turn hasten death, and they are reflected in the higher male suicide rate. The proscription on expressing emotions entailed in the masculine role definition probably exacerbates the stresses inherent in the obligation to support a family--financially and emotionally --and to succeed in an often highly competitive "rat race." (Janet Saltzman Chafetz, op.cit., pp. 64-65.)

9. In my survey of male employees I frequently found that when I asked the employee if he would ever consider taking a year off to care for children, he would consistently reply something like: "Personally I would like to do it, but I could really endanger myself here at work--imagine telling my boss I'm going to be a mother for a year!" If I agreed that might be impractical and asked, "Would you actively support a child-care center here in your company?," a not atypical reaction was, "If I keep pushing for things like that, I'll end up Vice President in Charge of Girls (laughter)." Over and over the employees seemed scared, even to the point of sweating, to be a part of anything out of the ordinary, particularly if it associated them with something "weaker," like women, or showed that our society considers "weakness" like self-examination. (Warren Farrell, op.cit., p. 48.)

B. LOSS OF ACADEMIC POTENTIAL

1. At age six when a boy enters first grade, he may be twelve months behind his female counterpart in development age, and by nine this discrepancy has increased to eighteen months. Thus he is working side by side with a female who may not only be bigger than he, but who seems better prepared to handle school more competently and more comfortably. (Frances Bentzen, "Sex Ratios in Learning and Behavior Disorders," National Elementary School Principal, 46, no. 2 (Nov. 1966, 13-17; as quoted in Nancy Frazier and Myra Sadker, Sexism in School and Society, New York: Harper & Row, 1973, p. 87.)

2. Among boys and girls of comparable IQ, girls are more likely to receive higher grades than boys. Also boys, who do equally well as girls on achievement tests get lower grades in school. In fact, throughout elementary school, two-thirds of all grade repeaters are boys. (Gary Peltier, "Sex Differences in the School: Problem and Proposed Solution," Phi Delta Kappan, 50, no. 3 (Nov. 1968), 182-85; as quoted in Frazier, Ibid., p. 92.)

3. Boys receive 8 to 10 times as many prohibitory control messages (warnings like: "That's enough talking Bill. Put that comic away, Joe") as their female classmates. Moreover, when teachers criticize boys, they are more likely to use harsh or

angry tones than when talking with girls about an equivalent misdemeanor. (Phil Jackson and Henriette Lahaderne, "Inequalities of Teacher-Pupil Contacts," in Melvin Silberman (ed.), The Experience of Schooling, New York: Holt, Rinehart and Winston, 1971, pp. 123-134; as quoted in Frazier, Ibid., p. 89.)

4. Studies of educational underachievement in the gifted have revealed that underachievement occurs twice as frequently among boys as among girls. (Ruth Hartley, op.cit., p. 185.)

5. Boys are the maladjusted, the low achievers, the truants, the delinquents, the inattentive, the rebellious. National delinquency rates are five times higher among boys than girls; in New York City, 63% of all drop-outs are boys. (Patricia Cayo Sexton, "Schools are Emasculating Our Boys," in Judith Stacey, op.cit., 138-141.)

6. Some researchers have found three times more boys than girls have trouble with reading. (Frazier, op.cit., p. 92.)

7. The "physical striver" considers it masculine not to care about what his teachers think. "How much you can get away with," is far more masculine than an enthusiastic "Look how much I learned!" The reading difficulty itself is perpetuated by the fear of studying, and the insecurity by the fear of appearing like a girl. (Warren Farrell, op.cit., pp. 34, 38.)

8. The poorly educated, physically striving male makes absolute statements, often bordering on the authoritarian. In this way he feels no one dare challenge him. The more educated student striver learns to articulate and hedge his statements so carefully as to never be vulnerable. Both are concerned with proving themselves right, rather than discovering what's right. (Warren Farrell, op.cit., pp. 39-40.)

C. LOSS OF NURTURANT AND SOCIAL-EMOTIONAL QUALITIES

1. ....our sex role stereotypes have left virtually the entire realm of emotional expression and human caring to femininity. It is difficult to imagine a genuine loving relationship involving the stoical, unemotional, instrumentally oriented, dominating, aggressive, and competitive nature of the masculine stereotype. Moreover, both males and females view a husband's primary function as that of provider; there is no socially defined and sanctioned expectation that he confide, comfort, or share, and without these there is scarcely "love." (Chafetz, op.cit., p. 166.)

2. Almost nothing in the prefatherhood learning of most males is oriented in any way to training them for parenting. They are actively discouraged as children from play activities involving baby surrogates and except in rare instances of large families

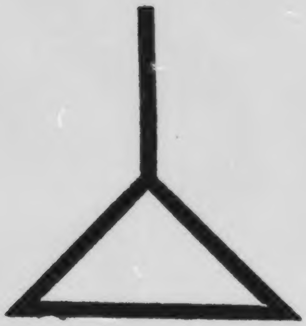
with few or no older sisters, they are not usually required to help much in the daily care of younger siblings. (Chafetz, op.cit., p. 178.)

3. By and large, most fathers, especially white middle class, probably relate very little to their children during infancy and early childhood, perceiving them as more or less of a nuisance. Fathers do not actively partake of the petty daily problems and needs of their offspring and they remain tangential to the intimate lives of their children, involved only in the "special" moments of excitement or disaster. In most cases fathers refuse even to engage in physical contact with their sons past infancy, preferring the handshake to the kiss. (Chafetz, op.cit., p. 180.)

4. In addition to the relative absence of fathers from boys' experience, we have evidence that the relations between boys and their fathers tend to be less good than those between girls and their mothers or fathers. (Hartley, op.cit., p. 188.)

5. Given the relative absence of male figures during his waking hours, the male toddler is hard pressed to find out what he is supposed to do. When the father is present he usually surpasses the mother in punishing the boy for being too "feminine" perhaps because of his own sex role insecurities. The boy finds out that "boys don't cry," "boys don't cling," and so on, but often on the basis of negative sanctions from parents and peers. (Chafetz, op.cit., pp. 73-74; and David Lynn, Parental and Sex Role Identification: A Theoretical Formulation, Berkeley, CA: McCutchan Publishing, 1969, pp. 57-64.)

6. In the long run, however, it is in men's relationships with each other that the proscription against having "feminine" feelings is most costly, because it precludes having a deep intimate involvement with someone who might share similar problems. In our society, where sex and affection are closely intertwined, if one gets too close to other men there is a fear that this affection will be seen as sexual, and homosexuality is the antithesis of masculinity. Furthermore, it would be difficult indeed to be supportive toward those persons with whom one is competing. This ban on emotionality does not necessarily apply to other cultures where men are allowed more latitude in expressiveness; in many European cultures men are allowed to embrace each other without compromising their masculinity. (Deborah, David and Robert Brannon (ed.) The Forty-Nine Percent Majority: The Male Sex Role, Reading, MA: Addison-Wesley, 1976, p. 50.)



FEMALENESS

SOME DAMAGING EFFECTS OF SEX STEREOTYPING ON GIRLS AND WOMEN

(Adapted from Sexism in School and Society, by Nancy Frazier and Myra Sadker, Harper & Row, 1973, 71-73)

A. LOSS OF ACADEMIC POTENTIAL

1. Intellectually, girls start off ahead of boys. They begin speaking, reading, and counting sooner; in the early grades they are even better in math. However, during the high school years, a different pattern emerges and girls' performance on ability tests begins to decline. Indeed, male students exhibit significantly more IQ gain from adolescence to adulthood than do their female counterparts. (Eleanor Maccoby, "Sex Differences in Intellectual Functioning," in Eleanor Maccoby (ed.), The Development of Sex Differences, Stanford, CA: Stanford University Press, 1966.)

2. Although women make much better high school grades than do men, they are less likely to believe that they have the ability to do college work. (Patricia Cross, "College Women: A Research Description," Journal of National Association of Women Deans and Counselors, 32, no. 1 (Autumn 1968), 12-21.)

3. Of the brightest high school graduates who do not go to college, 75-90 percent are women. (Facts About Women in Education, prepared by the Women's Equity Action League. Can be obtained from WEAL, 1253 - 4th Street, S.W., Washington, D.C.)

4. In 1900, women earned 6 percent of all doctoral degrees; in 1920, 15 percent, and by 1968, only 13 percent. In short, the percentage of doctorates earned by women has actually decreased since the 1920's. (Edith Painter, "Women: The Last of the Discriminated," Journal of National Association of Women Deans and Counselors, 34, no. 2 (Winter 1971), 59-62.)

B. LOSS OF SELF-ESTEEM

1. As boys and girls progress through school, their opinions of boys grow increasingly more positive and their opinions of girls increasingly more negative. Both sexes are learning that boys are worth more. (S. Smith, "Age and Sex Differences in Children's Opinions Concerning Sex Differences," Journal of Genetic Psychology, 54, no. 1 (March 1939), 17-25.)

2. Fewer high school women than men rated themselves above average on leadership, popularity in general, popularity with the opposite sex, and intellectual as well as social self-confidence. (Cross, op.cit.)

3. On the Bernreuter personality inventory, norms show that women are more neurotic and less self-sufficient, more introverted and less dominant than men. (R.G. Bernreuter, "The Theory and Construction of the Personality Inventory," Journal of Social Psychology, 4, no. 4 (November 1932), 387-405.)

4. College women believe that men desire a woman who is extremely passive and who places wifely and familial duties above her own personal and professional development. (Anne Steinman, Joseph Levi, and David Fox, "Self Concept of College Women Compared with Their Concept of Ideal Women and Men's Ideal Woman," Journal of Counseling Psychology, 11, no. 4 (Winter 1964), 27-33.)

5. College women respond negatively to women who have achieved high academic or vocational success, and at times display an actual desire to avoid success. (Matina Horner, "Woman's Will to Fail," Psychology Today, 3, no. 6 (November 1969), 36-38.)

6. Fifty-five percent of a group of women at Stanford and forty percent at Berkeley agreed with the following sentence: "There is a time when I wished I had been born a member of the opposite sex." Only one in seven male students would endorse such a statement. (Joseph Katz, No Time for Youth, San Francisco, Josey Bass, 1968.)

7. Both male and female college students feel the characteristics associated with masculinity are more valuable and more socially desirable than those associated with femininity. (John McKee and Alex Sheriffs, "The Differential Education of Males and Females," Journal of Personality, 35, no. 3 (September 1957), 356-371.)

C. LOSS OF OCCUPATIONAL POTENTIAL*

1. By the time they are in the fourth grade, girls' visions of occupations open to them are limited to four: teacher, nurse, secretary, or mother. Boys of the same age do not view their occupational potential through such restricting glasses. (Robert O'Hara, "The Roots of Careers," Elementary School Journal, 62, no. 5 (February 1962), 277-280.)

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* The attitude and competencies with which a young woman enters the labor market will become of increasing importance. It has been estimated that nine out of ten females will be working on a full-time basis at some point in their lives. Between 1968 and 1980, the Department of Labor estimates that the total number of women in the labor force will increase by 27 percent, whereas the total number of men will increase by only 20 percent. (Jeanne Holm, "Employment and Women: Cinderella Is Dead," Journal of National Association of Women Deans and Counselors, 34, no. 1, (Autumn 1970), 6-13.)

SOME DAMAGING EFFECTS OF SEX STEREOTYPING ON GIRLS AND WOMEN

2. By the ninth grade 25 percent of boys and only 3 percent of girls are considering careers in science or engineering. (Daryl Bem and Sandra Bem, "We're All Nonconscious Sexists," in Daryl Bem, Beliefs, Attitudes, and Human Affairs, Monterey, Cal: Brooks/Cole. Copyright 1970 by Wadsworth Pub. Co.)

3. Decline in career commitment has been found in girls of high school age. This decline was related to their feelings that male classmates disapproved of a women's using her intelligence. (Peggy Hawley, "What Women Think Men Think," Journal of Counseling Psychology, 18, no. 3 (Autumn 1971), 193-94.)

4. In a survey conducted in 1966 throughout the state of Washington 66.7 percent of boys and 59 percent of girls stated that they wished to have a career in professional occupations. However, 57 percent of the boys and only 31.9 percent of the girls stated that they actually expected to be working in such an occupation. (Walter Slocum and Roy Boles, "Attractiveness of Occupations to High School Students," Personnel and Guidance Journal, 46, no. 8, (April 1968), 754-761.)

5. College women become increasingly interested in being housewives from their freshman to their senior year in college. This is at the expense of academic and vocational goals. (Linda Bruemmer, "The Condition of Women in Society Today: A Review--Part 1," Journal of National Association of Women Deans and Counselors, 33, no. 1 (Autumn 1969), 18-22.)

6. In 1973, the median annual full-time income for a white man was $11,544; for a minority man $8,365; for a white women $6,559; and for a minority women, $5,775. (U.S. Department of Labor statistics.)

(See FACT SHEET: WOMEN & WORK for further information.)

* * * * * *

These key studies were drawn together in a list, meant to be representative rather than inclusive, to gain some sense of the growth that has been stunted and of the promise that has been denied.

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An Overview of Women in the Workforce

42%—42.1 million—of the U.S. work force are Women. In 1977, 56% of Women 16 and over worked all or part of the year.

During the last decade the labor force expanded beyond government estimates. A key factor for this expansion has been the large influx of women workers. The number of women holding jobs has grown from 18 million in 1950 to 42.1 million in July 1978, a 129% increase. The total work force has grown from 62.2 million in 1950 to 100.6 million in July 1978, a 61.7% increase.

The overall pattern of growth does not focus, however, on movements within the different segments of women in the labor force. Participation rates vary considerably among women of different ages, family and marital status, race, and educational levels as outlined below.

Of the Women in the Workforce in March 1978, Nearly 80% were in Clerical, Sales, Service, Factory or Plant Jobs

According to the seasonally adjusted data released in March 1978, women workers were divided into the following occupational categories:

Professional-technical	16.1%
Managerial-Administrative	6.3%
Sales	6.8%
Clerical	34.7%
Craft	1.7%
Operative	11.2%
Non-Farm laborer	1.6%
Service, including private household	20.5%
Farm laborer	1.1%

These data do not show the concentration of men and women into certain job titles. For example, in professional jobs 60% of the women are non-college teachers or nurses, while men tend to be lawyers, doctors, or college professors. Within each occupational category the wages between men and women vary considerably. For every dollar earned by a man, a woman in the same job category earns significantly less. As of May 1977, the wage gap was:

	Women	Men
Sales	$.45	$1.00
Clerical	$.64	$1.00
Service	$.65	$1.00
Manufacturing	$.59	$1.00

In 1977 Full-Time Women Workers Had a Median Income* of $6,256 Less Than Men

Women working full-time, year round in 1977 had a median income of $8,814, while men's income averaged $15,070. Women made 58.5¢ to every dollar made by men. In 1955, women's median income was $2,734 to men's $4,246 (64.3¢ to the dollar made by men.)

Women of Spanish origin had the lowest income of any racial/ethnic group. Their income was less than half of white male's. In 1977, the medium annual income for men and women by race was:

		Percent of White Males
White Males	$15,378	100%
Spanish Origin Males	$10,935	71.1%
Black Males	$10,602	68.8%
White Females	$ 8,870	57.6%
Black Females	$ 8,290	53.9%
Spanish Origin Females	$ 7,599	49.4%

**Income includes earnings plus social security, investments, etc.*

On an Average, Women Who Work Full-Time Earn 59 Cents for Every $1 Earned by Men

During the last 25 years, women's earnings as a percent of men's have dropped steadily. In 1955, full time women workers earned 64¢ to men's one dollar. By 1960 this figure had dropped to 61¢. Ten years later in 1970, women's earnings were calculated to be 59.4¢ per men's one dollar. 1977 census data show that the median annual earnings for full time male workers was $14,626 and for female workers was $8,618 or 58.9%.

In 1976, About One in Every Ten Working Women Belonged to a Union

Of the 38 million women workers in 1976, 11.3% belonged to a *labor union*, down from 12.6% of women workers in 1970. Between 1970-76, the number of unionized working women increased from 4 to 4.3 million, a 7.5% increase. The total number of union members increased from 19.2 to 19.5 million, a 1.5% increase. Women were 20.7% of all union members in 1976.

15.9% of all working women belonged to *unions and associations* in 1976. Women members increased from 5 to 6.1 million, a 22% increase; while overall membership increased from 21.1 to 22.8 million, a 33% increase, between 1970-1976.

The following percentage of all women in these occupations were union members in 1975:

34.1% of blue collar workers, including craft, operatives and non-farm laborers

11.5% of clerical workers

11.1% of service and private household workers.

6.2% of sales workers

For further information see August 1978 *Monthly Labor Review*, "Women in Labor Organizations: Their Ranks are Increasing," Bureau of Labor Statistics, U.S. Department of Labor.

Nearly 7 Out of Every 10 Women Born Between 1954-1958 are Now in the Work Force

In July 1978, 69% of women between 20 and 24 years of age, and 62% of women between 24 and 34 years of age, were working or looking for work. These figures have increased from 46% and 36%, respectively, in 1960. The only age group in which fewer than one-half of women currently work for pay is that group of 55 and over.

PERCENTAGE OF WOMEN IN U.S. LABOR FORCE

	Annual Averages			July 1978 Seasonally Adjusted
	1960	1970	1977	
18 and 19 years	50.9	53.6	60.5	62.4
20 to 24 years	46.1	57.7	66.5	69.1
25 to 54 years, total	42.9	50.1	58.4	60.5
25 to 34 years	36.0	45.0	59.5	62.6
35 to 44 years	43.4	51.1	59.6	61.5
45 to 54 years	49.8	54.4	55.8	57.3
55 to 64 years	37.2	43.0	41.0	40.9
65 years and over	10.8	9.7	8.1	8.5

The Number of Married Women in the Work Force is Over 5 Times as Large as in 1940

The change in distribution of married women workers (husband present) has been the most dramatic of all categories of female jobholders. In 1940, these married women comprised only 30%, or 4.2 million, of all women workers. In March, 1978, 55.6% nearly 23 million, of all female workers were married with husbands present.

Since 1970 the number of divorced women workers has doubled—the number rose from 1.9 million in 1970 to 3.9 million in March 1978. The number of never married single women jobholders increased from 7 million in 1970 to 10.2 million in 1978.

Overall, of the 42 million working women in the United States, 25% are single, 56% are married, 4% are separated, 5.5% are widowed and 9.5% are divorced.

The highest participation rate (74%) of any group of women classified by marital status are those who are divorced. In March, 1978, percentages of women jobholers 16 years or older in the various groups were never married—60.5%; married, husband absent—56.8%; husband present—47.6%; and widowed—22.4%.

More Than Half of All Husband-Wife Families in 1978 Had Two or More Wage Earners

In March 1978 there were 57.2 million families in the United States. Of these 47.4 million had both husband and wife present, representing 83% of all families. In nearly 6 out of 10 of all husband-wife families, both partners held paid jobs.

Female-headed families accounted for 8.2 million, or 14.4% of all American families, while male-only headed families totaled 1.6 million.

At the top of the family income scale are those with two or more earners—the husband and second family member other than the wife, though she is present. The median income for these families in 1977 was $23,945. At the bottom of the family income scale, excluding those without earners, are single-earner families headed by women. These families have a medium income of $7,977 per year.

Average American family incomes for 1977 were:

Total, all families	$16,146
one earner	13,218
two earners or more	20,415
Husband-wife families, total	17,720
Total, families headed by women	7,765
Total, families headed by men	14,538

The National Commision on Working Women is a nongovernmental, action-oriented body. It was created to focus on the needs and concerns of that approximate 80% of women in the workforce who are concentrated in lower-paying, lower-status jobs in service industries, clerical occupations, retail stores, factories and plants.

Commission members are women and men representing business, labor, the Congress, the media, academia and working women themselves. As its secretariat, the Center for Women and Work implements the Commission's programs, seeks to achieve its overall goals, and serves as a national exchange for ideas, information and research related to the world of women in the workforce. The center is a separate operational unit within the National Manpower Institute, a private, nonprofit organization dedicated to "the fullest and best use of the human potential." Major funding is through a grant from the National Institute of Education (Department of HEW), with special project funds from the Ford Foundation and the Rockefeller Family Fund, and private corporations. Sources for statistics are: U.S. Departments of Labor and Commerce, September 1978.

Special Labor Force Reports—Summaries

Divorced and separated women in the labor force—an update

ALLYSON SHERMAN GROSSMAN

Continuing a long-term trend, the labor force participation rate for divorced women in March 1977 remained higher than that for women of any other marital status. Divorced women were more apt to be year-round, full-time workers, to be clustered in better paying occupations, and to have more money than separated women who generally were younger, less educated, and more likely to be black.

More than 73 percent of divorced women were working, compared with 55 percent of separated women and 47 percent of married women, husband present.[1] Divorced and separated women accounted for 13 percent of the female work force and were responsible for more than one-quarter of the unusually large labor force expansion since 1975.[2]

Proportionately more black than white women were separated or divorced, with Hispanic women falling in between. Two of 10 blacks, compared with more than 1 of 10 Hispanics, and fewer than 1 of 10 whites were in disrupted marriages. Of these women, blacks were more likely to be separated, whites were more apt to be divorced, while Hispanics were equally divided between the two groups. (See table 1.)

Work experience

As a result of movements into and out of the labor force, the proportion of women and men who work at least part of any given year usually is greater than the share who work at any one point in time. For example, 54 percent of all married women had some work experience during 1976, while 47 percent worked or looked for work in March 1977. However, divorced women have such a strong attachment to the labor force that there was not much difference between the percentage with work experience during the calendar year and the percentage in the work force in any 1 month. Seventy-five percent of divorced women worked at some time during 1976, a proportion about equal to that in the labor force in March 1977. Table 2 shows the proportion of divorced, separated, and married women who worked in 1976.

Divorcees are also more likely to work all year (50 to 52 weeks) full time (35 hours or more per week). Of those with work experience in 1976, about 59 percent of divorced women and 47 percent of separated women were year-round, full-time workers. As expected, the proportion among married women was lower because the earnings of wives are usually augmented by the earnings of their husbands.

Divorced women most often report unemployment as their main deterrent to full-year work. Separated and married women—those more likely to have children—most often say that home and family responsibilities preclude their working all year. Proportionately more married women cite this reason for not working full year.

Working mothers

Among the prominent reasons that separated women have a lower labor force participation rate than divorced women is that the former are more likely to have children, especially younger chil-

Table 1. Labor force status of women by marital status, race, and Hispanic origin, March 1977

Characteristic	Population (in thousands)	Labor force participation rate[1]	Unemployment rate[2]
Divorced	4,863	73.2	8.5
White	4,076	74.4	8.0
Black	734	67.5	11.7
Hispanic	250	58.1	15.9
Separated[3]	3,110	56.1	13.8
White	1,981	56.3	13.3
Black	1,078	53.1	14.8
Hispanic	270	35.8	16.5
Married, husband present	47,984	46.6	6.8
White	43,775	45.8	6.6
Black	3,383	56.7	9.4
Hispanic	2,076	41.7	10.2

[1] Labor force as a percent of civilian noninstitutional population.

[2] Unemployed as a percent of labor force.

[3] Married, husband absent.

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dren. Nearly 5 of 10 separated mothers had children under age 6, compared with 3 of 10 divorced mothers. Only 47 percent of these separated mothers were in the labor force in March 1977, compared with 66 percent of the divorced mothers. (See table 3.)

Understandably, labor force participation rates of mothers with young children are substantially below those of women with school-age children (6 to 17 years), regardless of their marital status. The labor force rates for women with children of school age ranged from 82 percent for those who were divorced to 62 percent for those who were separated and to 56 percent for those who were married. Women with older children are older themselves and, compared with mothers of younger children, may have acquired more of the skills and experience necessary in today's labor markets. Also, parents of older children are not as encumbered by day care responsibilities and may have more flexibility in their choice of jobs.

Table 2. Work experience in 1976 by marital status in March 1977

[Numbers in thousands]

Characteristic	Divorced	Separated[1]	Married, husband present
Total in 1977	4,863	3,110	47,984
Worked in 1976:			
Total	3,650	1,800	25,826
Percent	100.0	100.0	100.0
Full time	83.2	75.6	66.9
50 to 52 weeks	59.0	46.7	41.4
Part time	16.8	24.4	33.1
Worked part year in 1976:			
Total	1,276	823	11,996
Percent	100.0	100.0	100.0
Reason for part year work:			
Unemployment or layoff	38.9	33.8	19.1
Illness or disability	14.7	9.8	6.9
Home responsibilities	28.4	41.1	64.8
Other	18.0	15.3	9.2

[1] Married, husband absent.

To a great extent, these two factors account for the high level of unemployment among mothers; and the younger their children, the higher their unemployment rate. Of those in the labor force with children under age 3, 18 percent of divorced mothers and 25 percent of separated mothers were unemployed in March 1977.

Reflecting the presence of children, the uncertainties of their transitional state and other factors, separated women are more plagued by joblessness throughout the year than divorced or married women. Three of 10 were unemployed at some time during 1976, compared with slightly more than 2 of 10 divorced women, and fewer than 2 of 10 married women. In fact, of those with work experience, proportionately more than twice as many separated as divorced or married women looked for work in 1976, but did not find any.

Occupation

Besides experiencing more unemployment than divorced or married women, separated women are more concentrated in lower paying occupations. In March 1977, 30 percent of separated women were in service occupations, compared with about 20 percent of either divorced or married women. Most of these service workers were engaged in jobs outside of private households; however, proportionately twice as many separated as divorced women were domestic workers. The high proportion of service workers reflects, in part, the lower educational attainment of separated women. One-third of all separated workers had not completed high school, compared with one-quarter of divorced workers, and one-fifth of married workers.

Table 3. Labor force status of women 16 and older, by marital status, presence and age of youngest child, March 1977

[Numbers in thousands]

Marital and labor force status	Total	No children under 18 years	With children under 18 years	With children 6 to 17 years only			With children under 6 years		
				Total	14 to 17 years, none younger	6 to 13 years, none younger	Total	3 to 5 years, none younger	Under 3 years
Population:									
Divorced	4,863	2,609	2,254	1,591	427	1,164	664	424	239
Separated[1]	3,110	1,431	1,679	895	234	661	784	380	404
Married, husband present	47,984	22,886	25,098	13,800	3,924	9,876	11,298	4,590	6,708
In labor force:									
Divorced	3,561	1,822	1,738	1,301	343	958	437	298	139
Separated[1]	1,715	794	921	555	144	411	366	221	145
Married, husband present	22,377	10,268	12,109	7,674	2,247	5,427	4,435	2,132	2,304
Labor force participation rate:[2]									
Divorced	73.2	69.8	77.1	81.8	80.5	82.3	65.9	70.3	58.2
Separated[1]	55.1	55.5	54.8	62.0	61.3	62.3	46.6	58.1	35.8
Married, husband present	46.6	44.9	48.2	55.6	57.3	54.9	39.3	46.4	34.3
Unemployment rate:[3]									
Divorced	8.5	7.6	9.5	7.6	7.2	7.8	15.0	13.8	17.6
Separated[1]	13.8	10.7	16.5	12.1	12.0	12.1	23.4	22.3	25.0
Married, husband present	6.8	6.1	7.4	5.5	5.4	5.6	10.8	8.7	12.7

[1] Married, husband absent.

[2] Labor force as a percent of population.

[3] Unemployed as a percent of labor force.

NOTE: Because of rounding, sums of individual items may not equal totals.

Generally, equal proportions of divorced and married women are blue-collar and white-collar workers—about 16 and 64 percent, respectively. The occupational distribution within blue-collar jobs did not vary by marital status; yet, among white-collar workers, divorced women were more likely than married women to be managers or administrators. (See table 4.)

Income sources vary

Total money income for divorced women in 1976 averaged about $6,200. The comparable amount for separated women was $4,100.[3] Although the personal money income of married women was below that of divorced or separated women—averaging $3,800 for all of 1976—financially they may have been better off. Median income for husband-wife families was about $16,200 in 1976 and rose to $18,700 when the wife was in the labor force.[4]

While most women reported that they received wage and salary earnings, more divorced than separated women had money from this source. Similarly, divorcees were more likely to have interest and dividend income and also to receive alimony or child support. In 1976, about 1 of 4 divorced women received alimony or child support payments compared with more than 1 of 10 separated women. Separated women were significantly more likely to have some form of welfare payments. Thirty-five percent were the recipients of supplemental security income, aid to families with dependent children, or other public assistance, compared with 23 percent of their divorced counterparts.

Table 4. Occupational distribution of employed women by marital status, March 1977

Occupational group	Divorced	Separated[1]	Married, husband present
Total employed			
Number (in thousands)	3,258	1,477	20,854
Percent	100.0	100.0	100.0
White collar, total	62.6	49.4	65.1
Professional-technical	15.1	12.7	17.1
Managerial-administrative, except farm	7.8	4.8	6.0
Sales	5.6	4.2	6.5
Clerical	34.1	27.7	35.5
Blue collar, total	16.6	20.1	15.5
Craft	2.4	2.0	1.6
Operatives, except transport	12.5	15.4	12.2
Operatives, transport	.7	1.2	.8
Nonfarm laborers	1.0	1.5	.9
Service, total	20.7	30.0	18.3
Private household	2.4	4.8	1.9
Other Service	18.3	25.2	16.4
Farm, total	.3	.6	1.1
Farmers and farm managers	.1	.2	.2
Farm laborers and supervisors	.2	.4	.9

[1] Married, husband absent.

NOTE: Because of rounding, sums of individual items may not equal totals.

Additional data are currently being developed on the sources and amounts of income of divorced and separated women. This work will be presented in a forthcoming *Monthly Labor Review* article featuring marital status data for 1978. ☐

FOOTNOTES

[1] Unless otherwise indicated, these findings are from the annual survey of marital and family characteristics of workers 16 years and over in the population. The survey was conducted in March 1977 for the Bureau of Labor Statistics by the Bureau of the Census. For an analysis of previous data, see Allyson Sherman Grossman, "The labor force patterns of divorced and separated women," *Monthly Labor Review*, January 1977, pp. 48–53. Estimates based on a sample, such as those shown in the tables, may vary considerably from results obtained by a complete count in cases where the numbers shown are small. Therefore, differences between small numbers or percents based on them may not be significant. For more information, see Beverly L. Johnson and Howard Hayghe, "Labor force participation of married women, March 1976," *Monthly Labor Review*, June 1977, pp. 32–36, reprinted with additional tabular data and an explanatory note as Special Labor Force Report 206.

[2] Between March 1975 and March 1977, the number of women in the labor force increased by 2.9 million.

[3] Median (average) incomes for divorced or separated women are based only on those women with income.

[4] *Money Income and Poverty Status of Families and Persons in the United States: 1976*, Series p-60, No. 107 (Bureau of the Census, 1977), p. 6.

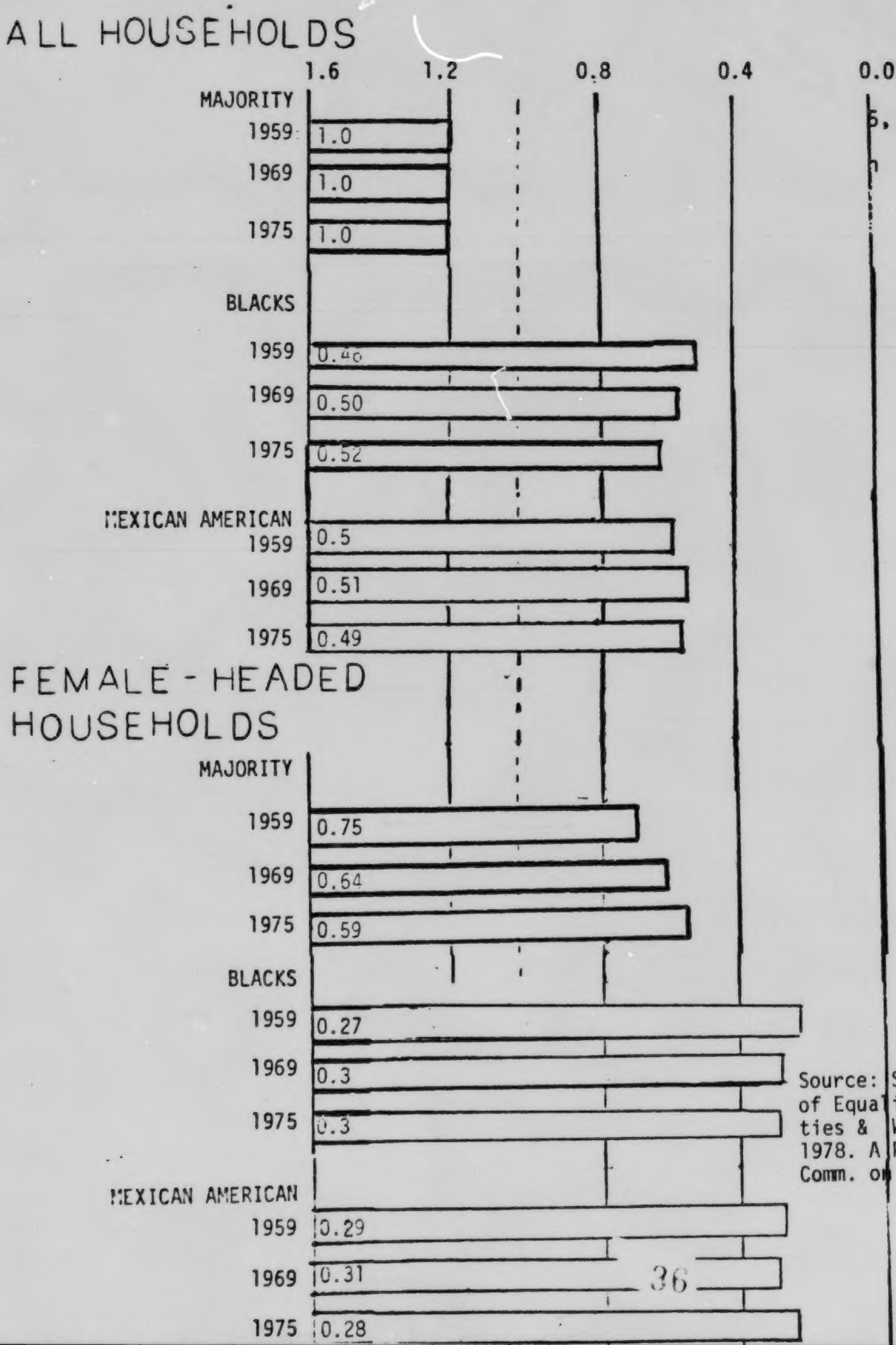
Societal changes stimulating increased participation of women in the labor force --

- men and women marrying at later ages
- birth rates declining
- divorce rates increasing
- cost of living increasing
- educational attainment is increasing
- housekeeping hours reduced by automated conveniences

Results --

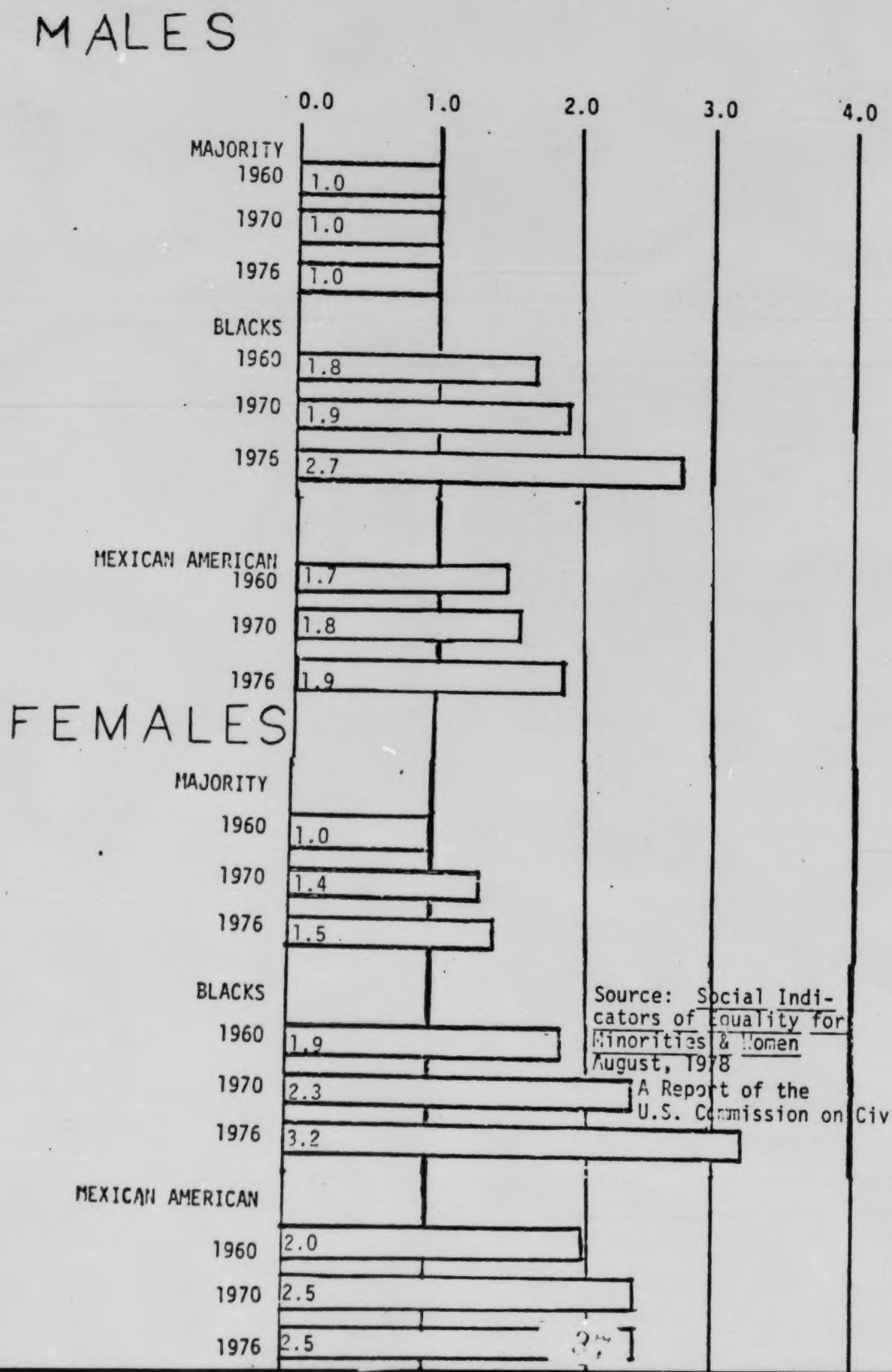
- more women are available to work
- more women want to work
- more women need to work
- more women are working

MEDIAN HOUSEHOLD PER CAPIT INCOME



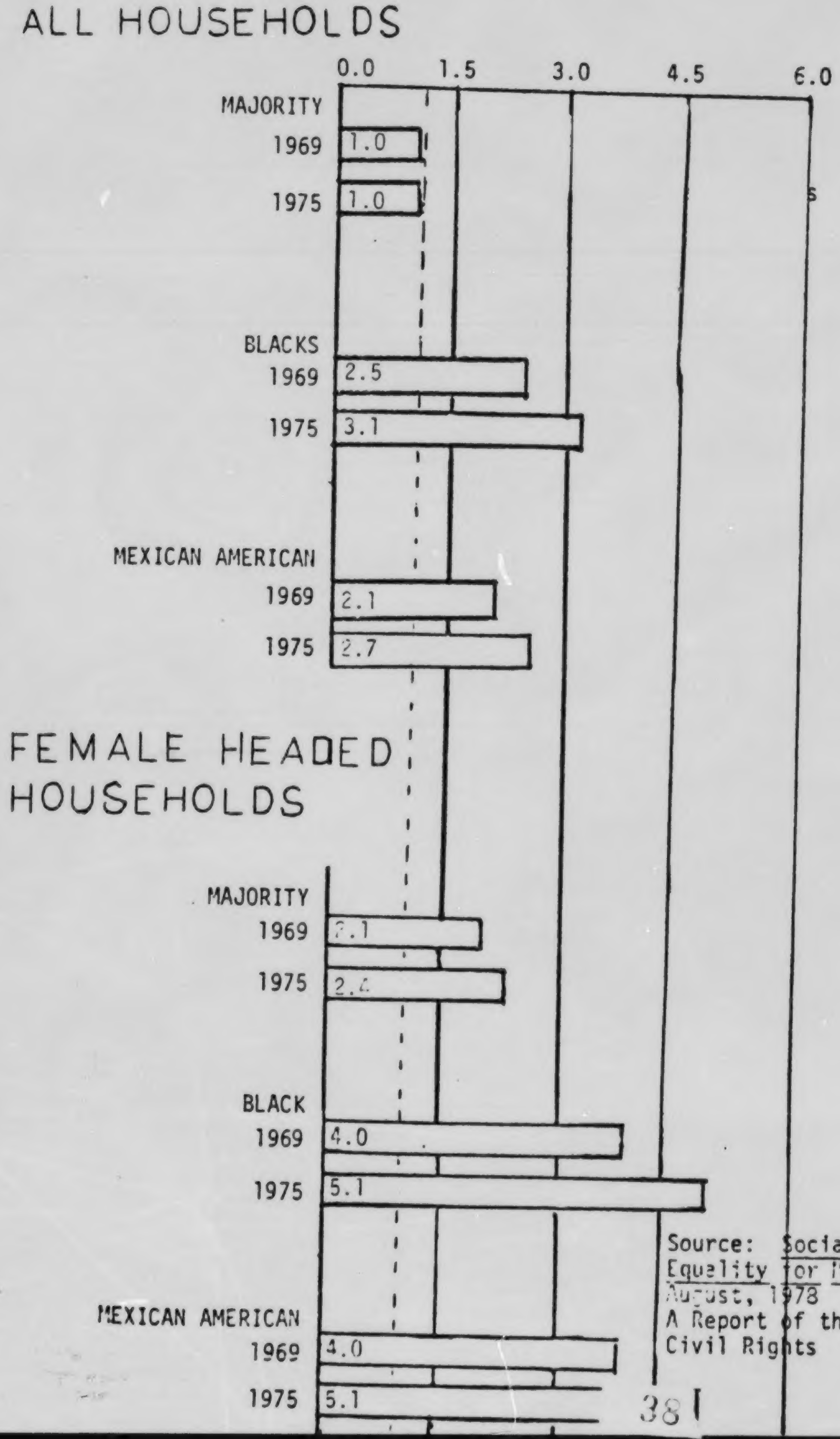
Source: Social Indicato
of Equality for Minori-
ties & Women - August,
1978. A Report of the U
Comm. on Civil Rights

UNEMPLOMENT



Source: Social Indicators of Equality for Minorities & Women
August, 1978
A Report of the
U.S. Commission on Civil Rights

POVERTY RATES



Source: Social Indicators of Equality for Minorities & Women
August, 1978
A Report of the U. S. Commission on Civil Rights

LEGISLATIVE OVERVIEW

III

	Title II of Education Amendments of 1976	Title IX of Education Amendments of 1972
Scope	Broader scope: includes sex bias, sex stereotyping and sex discrimination.	Limited scope: emphasizes sex discrimination.
Application	All state-funded and federally-funded vocational education programs.	Every recipient and each education program or activity receiving benefits from Federal financial assistance.
Requirements	All states participating in programs authorized by the Vocational Education Act of 1963 as amended are required to take action to eliminate sex bias and sex stereotyping.	Institutional self-evaluation and assurance of nondiscrimination based on sex in all education programs and activities receiving or benefiting from Federal financial assistance.

SBDL 33 cw

national advisory council on women's educational programs

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SUMMARY OF THE FINAL REGULATION[1] IMPLEMENTING THE VOCATIONAL EDUCATION AMENDMENTS OF 1976

PROVISIONS RELATING TO SEX BIAS AND SEX STEREOTYPING

INTRODUCTION

The National Advisory Council on Women's Educational Programs was established by Congress in 1974 with a mandate to advise Federal officials on the improvement of educational equity for women. In fulfilling that responsibility, the Council has actively promoted measures to eliminate sex bias and sex stereotyping in vocational education. The Council's concern stems from overwhelming evidence documenting pervasive sex bias in vocational education programs across the nation. Lack of access to non stereotyped vocational and technical training is a major cause of the concentration of women in low-paying, low-status jobs.[2]

The Vocational Education Act of 1963 was considerably amended by the Education Amendments of 1976 (Public Law 94-482). *A major purpose of the revised Act is to develop and carry out programs to overcome sex bias, sex discrimination and sex stereotyping in vocational education and to promote equal educational opportunity for both sexes* (Section 101 of the Act, 104.2 of the regulation). The 1976 Act marks the first time that Federal legislation has specifically addressed the need of women and girls for equal access to vocational education and job training. Its passage is a major breakthrough for women. The Act provides a variety of measures to improve significantly the vocational preparation of women and girls and to upgrade their status in the labor market.

The regulation implementing the Act was issued by the HEW Office of Education on October 3, 1977. Because of the importance of the Act and its unique potential for improving the educational and economic status of women, the Council developed this summary of those provisions of the regulation which relate specifically to the elimination of sex bias and sex stereotyping in vocational education.[3]

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[1] 45 CFR Parts 104 and 105. This summary of the regulation is not a legal document. Persons contemplating legal action should consult the regulation. The text appears in the *Federal Register*, October 3, 1977, page 53822.

[2] Hearings Before the Subcommittee on Elementary, Secondary and Vocational Education of the Committee on Education and Labor, House of Representatives, *Sex Discrimination and Sex Stereotyping in Vocational Education*, 94th Congress, First Session.

[3] A summary of the provisions of the Act which impact directly on women can be obtained from the National Advisory Council on Women's Educational Programs, 1932 M Street, NW, Suite 821, Washington, DC 20036.

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EX OFFICIO MEMBERS

Chairman, U.S. Commission on Civil Rights; Director, Women's Bureau, U.S. Department of Labor; Director, Women's Action Program, U.S. Department of Health, Education and Welfare

OVERVIEW OF SIGNIFICANT PROVISIONS

The new Vocational Education Act affects national, State and local governments. At the national level, the Act directs the HEW Office of Education to conduct studies and administer grants to States and private groups for a variety of purposes. The Act consolidates most vocational education categorical grants into a single block grant for each State. The States in turn distribute the funds to local education agencies and private groups. States may choose to spend funds among specific alternatives described in detail in the Act and the regulation.

States are required to spend at least $50,000 in each fiscal year for full-time personnel, popularly known as Vocational Education Sex Equity Coordinators, to work for the elimination of sex bias in vocational education. The States also are directed to spend some funds for displaced homemakers and other special groups.

States are required to submit to the Commissioner of Education five-year plans which describe the vocational education programs they will provide. The plans must detail the steps the States will take to eliminate sex bias, sex discrimination and sex stereotyping in vocational education programs. Each State also must conduct public hearings on the five-year plan throughout the regions of the State. For the first time, the Act requires the inclusion of a wide range of agencies and individuals within the State in planning and developing vocational education goals and programs. Each State must establish an advisory council to assist in the planning process. Women, including minority women, must be represented on these councils.

These provisions are significant because in the past policy-makers have ignored the vocational preparation of women and girls. The Act insures that some resources will be devoted to their needs and remedies the traditional lack of representation of women and minority women on State advisory councils and in the vocational education planning process.

DEFINITIONS
#104.73

The following definitions apply for the purposes of the Act and the regulation:

- *Sex bias* - behaviors resulting from the assumption that one sex is superior to the other.
- *Sex stereotyping* - attributing behaviors, abilities, interests, values and roles to a person or group of persons on the basis of sex.
- *Sex discrimination* - any action which limits or denies a person or group of persons opportunities, privileges, roles or rewards on the basis of sex.

NONDISCRIMINATION IN VOCATIONAL EDUCATION PROGRAMS #104.515 (d)(4), 104.592, 104.75 (e)(i)

Vocational education programs such as apprenticeship, industrial arts, cooperative vocational education, work-study programs, and vocational education student organizations, which are funded by the State's basic grant, are subject to the provisions of both Title IX (prohibiting sex discrimination) and the new Vocational Education Act (eliminating sex stereotyping).

NATIONAL PROGRAMS
#105.101 - 105.627

NATIONAL ADMINISTRATION

The Act and the regulation are administered by the Bureau of Occupational and Adult Education, Office of Education, HEW. The Presidentially-appointed National Advisory Council on Vocational Education advises the Federal government concerning the administration of the vocational education programs under the Act. For the first time, women and minority women who are knowledgeable about sex discrimination in employment and training must be appointed to that Council. (Sections 160(a), 162 (a)(6), (b) of the Act.)

GRANTS AND CONTRACTS TO ELIMINATE SEX BIAS
#105.104

The Commissioner of Education is authorized to use some funds for contracts and grants for research and development of nationally significant model programs. These awards may be used to assist in overcoming sex bias and sex stereotyping in curriculum, guidance and counseling and staff and teacher attitudes and behavior. In the review of applications under this section, points will be awarded for the use of female professional staff and for plans to eliminate sex bias and sex stereotyping in the proposed projects (#105.110(h)(4),(k)).

VOCATIONAL INFORMATION DATA SYSTEM
#104.116

The Commissioner of Education, in conjunction with the Administrator of the National Center for Education Statistics, must develop a uniform system for collecting and reporting national vocational education data including school enrollments by race and sex. The regulation does not require crosstablulation by race-by sex.

FELLOWSHIPS FOR VOCATIONAL EDUCATION LEADERSHIP
#105.301 - 105.443

The Commissioner of Education will award fellowships for fulltime study in vocational education. Points will be awarded to applicants whose goals are to eliminate sex bias in vocational education and to applicants preparing themselves to teach vocational education courses which are nontraditional for their sex. Equitable distribution of males and females will be considered in the awarding of fellowships.

STATE PROGRAMS
#104.1 - 104.96

STATE ADVISORY COUNCILS
#104.91 - 104.97

Each State seeking Federal funds under the Act must designate a State board, usually the State board of education, to be responsible for the administration of vocational education programs (#104.31). The governor or the State board of education must appoint an advisory council whose major responsibilities are to assist the State board in the planning process and to conduct evaluations of vocational education programs, including programs to overcome sex bias.

The membership of the council must include individuals representing a wide variety of interests and the general public. The council must appropriately represent both sexes, racial and ethnic minorities and the regions of the State. *Appropriate representation* means that the composition of the council must reflect the percentage of minorities and women either in the population or in the work force of the State. The majority of the council should be from fields other than education. No member of the council may officially represent more than one required category.

Women (including minority women) must be appointed to the State advisory council. They must have experience in employment and training programs and be knowledgeable about the problems of sex discrimination in training and employment. Minority women appointed should have the same qualifications with regard to the problems faced by minority women.

LOCAL ADVISORY COUNCILS
#104.111 - 104.112

Each local education agency or institution assisted under the Act must establish an advisory council on vocational education to be composed of representatives of specific interests and the general public. The council must appropriately represent both sexes and racial and ethnic minorities served by the local education agency or institution.

VOCATIONAL EDUCATION SEX EQUITY COORDINATOR
#104.71 - 104.76

Each State receiving funds under the Act must spend at least $50,000 of its Federal grant each fiscal year for full-time personnel to assist the State board in providing equal opportunity in vocational education to both sexes and in eliminating sex bias, sex discrimination and sex stereotyping from all vocational education programs. The State should match the qualifications of applicants with the responsibilities of the job and is encouraged to hire personnel with a commitment to the elimination of sex bias in vocational education and a knowledge of the barriers to equal access for both sexes.

The duties of the Vocational Education Sex Equity Coordinator include the following:

- reviewing the State five-year and annual plans and making recommendations concerning the programs to eliminate sex bias;
- publicizing programs and activities designed to reduce sex discrimination in vocational education;
- collecting and analyzing data on the status of female students and employees;
- monitoring grant distribution to insure that the needs and interests of women are addressed by projects assisted under the Act;
- monitoring all vocational education programs in the State for sex bias;
- reviewing Title IX self-evaluations;
- developing remedies and recommendations to overcome sex bias;
- assisting local education agencies in their efforts to improve opportunities for women in vocational education.

STATE PLANNING PROCESS
#104.161 - 104.405

States seeking funds under the Act must submit five-year plans, annual program plans and accountability reports to the Commissioner of Education. The five-year plans must explain how Federal funds received will be allocated and describe the vocational education programs to be supported. The annual program plans and the accountability reports must account for the expenditure of funds and provide yearly reviews of progress toward goals.

POLICIES FOR ERADICATING SEX DISCRIMINATION
#104.187

The five-year plan must include a detailed description of the State's plan to insure equal access for both sexes to vocational education programs. The plan must describe

- actions to overcome sex discrimination and sex stereotyping in all State and local vocational education programs;
- incentives to encourage the enrollment of both sexes in nontraditional courses of study;
- incentives to encourage the development of model programs to reduce sex bias and sex stereotyping in job training and placement for all occupations;
- programs to assess and meet the needs of displaced homemakers and other special groups (#104.621).

The annual plans and the accountability reports must describe the results of the State's program to eliminate sex discrimination and to assure equal access for both sexes to vocational education (#104.222(f)(2), 104.241(b)(1), 104.402).

PUBLIC PARTICIPATION IN THE PLANNING PROCESS
#104.162 - 104.267

The State board is required to conduct a series of public hearings throughout the State on the five-year plans, annual plans and accountability reports. The hearings should provide an opportunity for all interested segments of the population to comment on goals, programs and allocation of resources for vocational education. The five-year plan must include the views expressed by the public, the state's responses to those views and an explaination for views not accepted for inclusion in the plan.

DISPLACED HOMEMAKERS AND OTHER SPECIAL GROUPS
#104.621 - 104.622

States must use some funds to provide vocational education programs for displaced homemakers, single heads of households, homemakers seeking employment, part-time workers seeking full-time jobs and persons seeking nontraditional jobs. The programs must include organized education and training to prepare these individuals for employment, courses in job search techniques and placement services upon completion of the vocational education programs. Although these programs are mandatory, the level of funding is left to the discretion of the State.

SUPPORT SERVICES FOR WOMEN
#104.601 - 104.603

States may use funds for support services for women who enter vocational education programs designed to prepare them for nontraditional jobs. Support services include

- counseling women on the nature of nontraditional training and employment and on ways of overcoming the difficulties and barriers they may encounter;
- informing women about the options, opportunities and range of jobs available;
- assisting women in finding employment relevant to their training and interests;
- increasing the number of female instructors of nontraditional courses in order to provide role models for female students.

DAY CARE SERVICES
#104.611

States may use funds to provide day care services to children of male and female students (including single parents) enrolled in secondary and postsecondary vocational education programs.

VOCATIONAL GUIDANCE AND COUNSELING
#104.761 - 104.776

The Act designates some funds to support vocational guidance and counseling. States may spend all or part of these funds to overcome sex bias and sex stereotyping through inservice training of vocational guidance counselors and teachers. Such training should acquaint vocational educators with

- the changing work patterns of women;
- ways of overcoming occupational sex stereotyping;
- ways of helping girls and women select careers on the basis of their needs and interests.

GRANTS TO OVERCOME SEX BIAS
#104.791 - 104.793

States may award grants for projects designed to overcome sex bias and sex stereotyping in vocational education programs

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and curriculum materials and for programs to acquaint teachers, administrators and counselors with effective means of overcoming sex bias (also see #104.701(d), 104.705(c)).

States may award contracts for "exemplary and innovative projects." Such projects must give priority to reducing sex bias and sex sterrotyping in vocational education (#104.706).

CONSUMER AND HOMEMAKER EDUCATION

#104.904

The Act designates some funds to support programs in consumer and homemaking education. These programs must

- encourage both males and females to prepare for combining the roles of homemaker and wage earner;
- promote the development of curriculum materials which deal with the changing roles of women and men in the work world and the home.

* * * *

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Title IX of the 1972 Education Amendments

Title IX prohibts discrimination on the basis of sex against students and employees of education programs and activities receiving Federal funds. Nearly all elementary, secondary and postsecondary institutions are covered under this legislation. The Title IX Regulation prohibits sex discrimination in such areas as:

- admissions to vocational, graduate, professional and public undergraduate schools
- access to courses and programs
- counseling and guidance--tests, materials, and practices
- physical education and athletics
- vocational education programs
- student rules and policies
- financial assistance
- student housing
- extracurricular activities
- employment in educational institutions

The Regulation covering Title IX requires education agencies and institutions to develop grievance procedures for the local handling of complaints of discrimination. This procedure may be used or complaints may be filed directly with:

- The Office for Civil Rights
  U.S. Department of Health, Education and Welfare
  Washington, D.C. 20201

SBDL 34 cw

federal register

WEDNESDAY, MARCH 21, 1979

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Office for Civil Rights

Office of the Secretary

■

VOCATIONAL EDUCATION PROGRAMS GUIDELINES FOR ELIMINATING DISCRIMINATION AND DENIAL OF SERVICES ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, SEX AND HANDICAP

[4110-12-M]

Title 45—Public Welfare

SUBTITLE A—DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

VOCATIONAL EDUCATION PROGRAMS

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap

AGENCY: Office for Civil Rights, Department of Health, Education, and Welfare.

ACTION: Final Guidelines for Vocational Education Programs.

SUMMARY: These guidelines explain the civil rights responsibilities of recipients of Federal funds offering or administering vocational education programs. They derive from and provide guidance supplementary to Title VI of the Civil Rights Act of 1964 and the implementing departmental regulation (45 CFR Part 80), Title IX of the Education Amendments of 1972 and the implementing departmental regulation (45 CFR Part 86), and Section 504 of the Rehabilitation Act of 1973 and the implementing departmental regulation (45 CFR Part 84).

EFFECTIVE DATE: March 15, 1979.

FOR FURTHER INFORMATION CONTACT:

David Gerard, Office of Standards, Policy, and Research, Department of Health, Education and Welfare, Office for Civil Rights, 330 Independence Avenue, S.W., Washington, D.C. 20201 (telephone 202-245-9177).

SUPPLEMENTARY INFORMATION: The following Guidelines explain how civil rights laws and Department regulations apply to vocational education programs. They are issued as a result of injunctive orders entered by the United States District Court for the District of Columbia in *Adams* v. *Califano*. They are also issued because the Department has found evidence of continuing unlawful discrimination in vocational education programs.

A. Legal Basis for the Guidelines

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in any program or activity receiving Federal financial assistance. The Department of Health, Education, and Welfare issued regulations implementing Title VI in 1965. Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex in education programs receiving or benefiting from Federal financial assistance. The Department issued regulations implementing Title IX in 1975. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of handicap in any program or activity receiving Federal financial assistance. The Department issued regulations implementing Section 504 in 1977. These civil rights statutes and their implementing regulations apply to vocational education programs.

In 1973, the Department of Health, Education, and Welfare was sued for its failure to enforce Title VI in a number of education areas, including vocational education (*Adams* v. *Califano*). As a result of this litigation, the Department was directed to enforce civil rights requirements in vocational education programs through compliance reviews, a survey of enrollment and related data, and the issuance of guidelines explaining the application of Title VI regulations to vocational education. The Guidelines that follow are issued to meet a requirement of the *Adams* court orders.

B. Factual Basis for the Guidelines

The Guidelines are also adopted because it is apparent that many vocational education administrators engage in unlawfully discriminatory practices. They need additional guidance and support from the Department to meet their obligations under civil rights authorities.

Information provided by the Office of Education's Bureau of Occupational and Adult Education for 1976 and 1977 reveals that male and female students are concentrated in programs traditionally identified as intended for them:

	Percent of total enrollment			
	1976		1977	
	Male	Female	Male	Female
Health occupations	21.2	78.8	21.2	78.8
Occupational home economics	15.3	84.7	16.1	83.9
Consumer and homemaking	16.8	83.2	18.4	81.6
Office occupations	24.9	75.1	24.9	[illegible]
Technical	88.7	11.3	83.0	[illegible]

	Percent of total enrollment			
	1976		1977	
	Male	Female	Male	Female
Trade and industrial	87.3	12.7	85.6	14.4
Vocational agriculture	88.7	11.3	85.2	14.8

In recent years vocational education administrators have addressed unlawful discrimination in their programs. Generally, they have taken advantage of the affirmative action provisions of the Vocational Education Amendments of 1976. Administrative procedures to implement these provisions are in place and are contributing to equal opportunity. Thus the above chart suggests that between 1976 and 1977, female participation increased in technical, trade and industrial, and vocational agriculture programs. There was also an increase in male participation in Consumer and Homemaking programs and Occupational Home Economics programs.

Current information on the enrollment of handicapped and minority students in specific vocational programs is not available. This deficiency will be corrected through the Office for Civil Rights Vocational Education Survey of 1979 and the Vocational Education Data System (VEDS) required by the Vocational Education Amendments of 1976. However, compliance reviews conducted by OCR investigative staff from 1973 to 1978 consistently found civil rights violations in vocational schools. For example:

1. Eligibility requirements such as residence within a geographic area or admissions tests deny vocational education opportunities on the basis of race, color, national origin and handicap;
2. Handicapped students are impermissibly assigned to separate annexes or branches; they are also denied equal vocational education opportunities as a result of inaccessible facilities and inadequate evaluation procedures;
3. Vocational schools established for students of one race, national origin or sex continue as essentially segregated facilities;
4. National origin minorities with limited proficiency in English are denied equal opportunity to participate in vocational programs;
5. Vocational education administrators often fail to adequately protect against discrimination in the placement of students with employers;
6. Faculty and staff are assigned to vocational programs on the basis of race, national origin, sex and handicap.

Reports from advocate groups have identified other possible civil rights violations. For example, the N.A.A.C.P. Legal Defense Fund (LDF) has alleged that State agencies engage in unlawful discrimination against urban areas in the allocation of Federal vocational education funds.

C. SCOPE OF GUIDELINES

The Guidelines primarily address the civil rights violations listed immediately above as found in compliance reviews. They do not identify every civil rights violation that may arise in a vocational education setting. The Guidelines derive from and supplement and must be read in conjunction with civil rights laws and Department regulations.

Section III of the Guidelines, which prohibits discrimination in the allocation of vocational education funds, derives in part from and must be read in conjunction with, the Vocational Education Act and Office of Education implementing regulations. These Guidelines, particularly Section III, have been reviewed by the Department's Office of Education and found consistent with its policies.

D. STATE AGENCY RESPONSIBILITIES

Most comments on the Guidelines sought deletion or clarification of, or a change to, a stated paragraph or subparagraph. However, Section II, which records the responsibilities of State agency personnel, was questioned in its entirety as imposing a new burden more reasonably assigned to the Office for Civil Rights.

Section II contains two requirements. First, State agencies in performing any activity required under State or Federal law, must be certain that they do not "require, approve of, or engage in" any unlawful discrimination. For example, State agencies are often required to review or approve the site selected by or the building specifications approved by local school district officials to assure that the project is fiscally sound. The Guidelines provide that in such cases the State agency must also examine whether the site location will result in the denial of access to minority group persons and whether the building and programs will be inaccessible to handicapped persons. If it finds such violations the State agency cannot approve the project. The second requirement of Section II is generally addressed to the agency referred to in the Vocational Education Amendments of 1976 as the "State Board or agency . . . sole[ly] responsible for the administration or . . . supervision of the programs [conducted in the State] under the Act." These agencies are required by the Guidelines to monitor subrecipients for civil rights compliance through technical assistance, analyses of already compiled information and data, and periodic compliance reviews.

These are not new requirements. The first merely restates what has become axiomatic—a recipient cannot engage or participate in unlawful discrimination. The second requirement—monitoring subrecipients for compliance—derives from the Department's Title VI regulation which provides in subparagraph 80.4(b):

> Every application by a State or State agency to carry out a program involving continuing Federal financial assistance * * * shall * * * provide or be accompanied by provision for such methods of administration * * * as are found by the responsible Department official to give reasonable assurance that the applicant and all recipients of Federal financial assistance under such program will comply with all requirements imposed by or pursuant to this regulation.

Thus the Department's Title VI regulation requires State agency recipients to adopt and obtain Department approval for methods and procedures through which subrecipients can be monitored for compliance with civil rights authorities.[1]

It was suggested that it is "unrealistic" to expect closely aligned officials—State agency and local personnel—to work at odds with each other. This is neither the intent nor the expected result of the final Guidelines. Many forms of impermissible discrimination are caused by misunderstandings or lack of information and guidance on the requirements of the law. State agency personnel should therefore be of assistance to and not in conflict with local personnel. Moreover, there is a need for additional conciliatory rather than adversarial compliance activity.

State agencies also argued that the Office for Civil Rights cannot and should not delegate its responsibilities for civil rights enforcement to recipients. Such a result is neither intended nor expected. The Guidelines contemplate adding, not substituting, resources for civil rights compliance activity. The Bureau of Occupational and Adult Education presently monitors State agencies for compliance with the Vocational Education Act. Under the Guidelines, BOAE and State agencies will engage in activities supplementary to those of the Office for Civil Rights.[2] These Guidelines do not contemplate any reduction of OCR compliance and enforcement activity. And OCR will lead, assist and monitor BOAE and State agencies in their civil rights activities. This approach derives from the Department's commitment to bring all of its agencies and recipients to the critical task of obtaining compliance with civil rights laws and regulations. It is also supported by the United States Civil Rights Commission.[3]

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[1] Although the regulations for Title IX and Section 504 do not assign a similar responsibility to State agencies, the Department intends to issue a Notice of Proposed Rulemaking to eliminate this inconsistency with Title VI. If revisions to the Title IX and Section 504 regulations are not adopted by the Department, these Guidelines must be revised.

[2] State agencies will require additional assistance from OCR and BOAE to understand and meet their responsibilities under the Guidelines. Such assistance will be provided through memoranda to be issued during the next 90 days. See comment and response number 9, below.

CONCLUSION

Vocational education is a critical and growing sector of the Nation's education system. It is offered in over 14,000 school districts and in community and junior colleges. It is also provided through more than 2,000 secondary and postsecondary vocational education centers (often known as Area Vocational Education Schools, or AVES), that have as their primary or sole objective the teaching of skills that lead to employment. The variations of programs and courses number in the thousands. They include, for example, "work study" for students needing part-time employment to support their vocational studies; "cooperative education" for students who receive credit for work at jobs related to their vocational field; and "apprentice training" for students affiliated with a labor union or another sponsor. Whatever the organization of vocational education, it is closely tied to the skill development needs of communities, States, and regions. Obtaining compliance with civil rights authorities in these diverse programs will require the participation and cooperation of all vocational education administrators and all agencies of the Department of Health, Education and Welfare. These Guidelines are designed to encourage that cooperation and compliance activity. They are provided with the expectation that they will contribute to bringing an end to unlawful discrimination against persons seeking the skills necessary for gainful and meaningful employment.

PART 80—NONDISCRIMINATION UNDER PROGRAMS RECEIVING FEDERAL ASSISTANCE THROUGH THE DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE EFFECTUATION OF TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

1. In 45 CFR Part 80 Appendix B is added to read as follows:

APPENDIX B—GUIDELINES FOR ELIMINATING DISCRIMINATION AND DENIAL OF SERVICES ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, SEX, AND HANDICAP IN VOCATIONAL EDUCATION PROGRAMS

I. SCOPE AND COVERAGE

A. APPLICATION OF GUIDELINES

These Guidelines apply to recipients of any Federal financial assistance from the Department of Health, Education, and Welfare that offer or administer programs of vocational education or training. This includes State agency recipients.

B. DEFINITION OF RECIPIENT

The definition of "recipient" of Federal financial assistance is established by Department regulations implementing Title VI, Title IX, and Section 504 (45 CFR 80.13(i), 86.2(h), 84.3(f).

For the purposes of Title VI:

The term "recipient" means any State, political subdivision of any State, or instrumentality of any State or political subdivision, any public or private agency, institution, or organization, or other entity, or any individual, in any State, to whom Federal financial assistance is extended, directly or through another recipient, for any program, including any successor, assignee, or transferee thereof, but such term does not include any ultimate beneficiary [e.g., students] under any such program. (45 CFR 80.13(i)).

For the purpose of Title IX:

"Recipient" means any State or political subdivision thereof, or any instrumentality of a State or political subdivision thereof, any public or private agency, institution, or organization, or other entity, or any person to whom Federal financial assistance is extended directly or through another recipient and which operates an education program or activity which receives or benefits from such assistance, including any subunit, successor, assignee, or transferee thereof. (45 CFR 86.2(h)).

For the purposes of Section 504:

"Recipient" means any State or its political subdivision, any instrumentality of a State or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended directly or through another recipient, including any successor, assignee, or transferee of a recipient, but excluding the ultimate beneficiary of the assistance. (45 CFR 84.3(f)).

C. EXAMPLES OF RECIPIENTS COVERED BY THESE GUIDELINES

The following education agencies, when they provide vocational education, are examples of recipients covered by these Guidelines:

1. The board of education of a public school district and its administrative agency.
2. The administrative board of a specialized vocational high school serving students from more than one school district.
3. The administrative board of a technical or vocation school that is used exclusively or principally for the provision of vocational education to persons who have completed or left high school (including persons seeking a certificate or an associate degree through a vocational program offered by the school) and who are available for study in preparation for entering the labor market.
4. The administrative board of a postsecondary institution, such as a technical institute, skill center, junior college, community college, or four year college that has a department or division that provides vocational education to students seeking immediate employment, a certificate or an associate degree.
5. The administrative board of a proprietary (private) vocational education school.
6. A State agency recipient itself operating a vocational education facility.

D. EXAMPLES OF SCHOOLS TO WHICH THESE GUIDELINES APPLY

The following are examples of the types of schools to which these Guidelines apply.

1. A junior high school, middle school, or those grades of a comprehensive high school that offers instruction to inform, orient, or prepare students for vocational education at the secondary level.
2. A vocational education facility operated by a State agency.
3. A comprehensive high school that has a department exclusively or principally used for providing vocational education; or that offers at least one vocational program to secondary level students who are available for study in preparation for entering the labor market; or that offers adult vocational education to persons who have completed or left high school and who are available for study in preparation for entering the labor market.
4. A comprehensive high school, offering the activities described above, that receives students on a contract basis from other school districts for the purpose of providing vocational education.
5. A specialized high school used exclusively or principally for the provision of vocational education, that enrolls students from one or more school districts for the purpose of providing vocational education.
6. A technical or vocational school that primarily provides vocational education to persons who have completed or left high school and who are available for study in preparation for entering the labor market, including students seeking an associate degree or certificate through a course of vocational instruction offered by the school.
7. A junior college, a community college, or four-year college that has a department or division that provides vocational education to students seeking immediate employment, an associate degree or a certificate through a course of vocational instruction offered by the school.
8. A proprietary school, licensed by the State, that offers vocational education.

NOTE.—Subsequent sections of these Guidelines may use the term *secondary vocational education center* in referring to the institutions described in paragraphs 3, 4 and 5 above or the term *postsecondary vocational education center* in referring to institutions described in paragraphs 6 and 7 above or the term *vocational education center* in referring to any or all institutions described above.

II. RESPONSIBILITIES ASSIGNED ONLY TO STATE AGENCY RECIPIENTS

A. RESPONSIBILITIES OF ALL STATE AGENCY RECIPIENTS

State agency recipients, in addition to complying with all other provisions of the Guidelines relevant to them, may not require, approve of, or engage in any discrim nation or denial of services on the basis of race, color, national origin, sex, or handicap in performing any of the following activities:

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[3] United States Commission on Civil Rights, *The Federal Civil Rights Enforcement Effort—1974, Vol. VI, To Extend Federal Financial Assistance*. 1975, p. 809

1. Establishment of criteria or formulas for distribution of Federal or State funds to vocational education programs in the State;

2. Establishment of requirements for admission to or requirements for the administration of vocational education programs;

3. Approval of action by local entities providing vocational education. (For example, a State agency must ensure compliance with Section IV of these Guidelines if and when it reviews a vocational education agency decision to create or change a geographic service area.);

4. Conducting its own programs. (For example, in employing its staff it may not discriminate on the basis of sex or handicap.)

B. STATE AGENCIES PERFORMING OVERSIGHT RESPONSIBILITIES

The State agency responsible for the administration of vocational education programs must adopt a compliance program to prevent, identify and remedy discrimination on the basis of race, color, national origin, sex or handicap by its subrecipients. (A "subrecipient," in this context, is a local agency or vocational education center that receives financial assistance through a State agency.) This compliance program must include:

1. Collecting and analyzing civil rights related data and information that subrecipients compile for their own purposes or that are submitted to State and Federal officials under existing authorities;

2. Conducting periodic compliance reviews of selected subrecipients (i.e., an investigation of a subrecipient to determine whether it engages in unlawful discrimination in any aspect of its program); upon finding unlawful discrimination, notifying the subrecipient of steps it must take to attain compliance and attempting to obtain voluntary compliance;

3. Providing technical assistance upon request to subrecipients. This includes assisting subrecipients identify unlawful discrimination and instructing them in remedies for and prevention of such discrimination;

4. Periodically reporting its activities and findings under the foregoing paragraphs, including findings of unlawful discrimination under paragraph 2, immediately above, to the Office for Civil Rights.

State agencies are not required to terminate or defer assistance to any subrecipient. Nor are they required to conduct hearings. The responsibilities of the Office for Civil Rights to collect and analyze data, to conduct compliance reviews, to investigate complaints and to provide technical assistance are not diminished or attenuated by the requirements of Section II of the Guidelines.

C. STATEMENT OF PROCEDURES AND PRACTICES

Within one year from the publication of these Guidelines in final form, each State agency recipient performing oversight responsibilities must submit to the Office for Civil Rights the methods of administration and related procedures it will follow to comply with the requirements described in paragraphs A and B immediately above. The Department will review each submission and will promptly either approve it, or return it to State officials for revision.

III. DISTRIBUTION OF FEDERAL FINANCIAL ASSISTANCE AND OTHER FUNDS FOR VOCATIONAL EDUCATION

A. AGENCY RESPONSIBILITIES

Recipients that administer grants for vocational education must distribute Federal, State, or local vocational education funds so that no student or group of students is unlawfully denied an equal opportunity to benefit from vocational education on the basis of race, color, national origin, sex, or handicap.

B. DISTRIBUTION OF FUNDS

Recipients may not adopt a formula or other method for the allocation of Federal, State, or local vocational education funds that has the effect of discriminating on the basis of race, color, national origin, sex, or handicap. However, a recipient may adopt a formula or other method of allocation that uses as a factor race, color, national origin, sex, or handicap [or an index or proxy for race, color, national origin, sex, or handicap e.g., number of persons receiving Aid to Families with Dependent Children or with limited English speaking ability] if the factor is included to compensate for past discrimination or to comply with those provisions of the Vocational Education Amendments of 1976 designed to assist specified protected groups.

C. EXAMPLE OF A PATTERN SUGGESTING UNLAWFUL DISCRIMINATION

In each State it is likely that some local recipients will enroll greater proportions of minority students in vocational education than the State-wide proportion of minority students in vocational education. A funding formula or other method of allocation that results in such local recipients receiving per-pupil allocations of Federal or State vocational education funds lower than the State-wide average per-pupil allocation will be presumed unlawfully discriminatory.

D. DISTRIBUTION THROUGH COMPETITIVE GRANTS OR CONTRACTS

Each State agency that establishes criteria for awarding competitive vocational education grants or contracts must establish and apply the criteria without regard to the race, color, national origin, sex, or handicap of any or all of a recipient's students, except to compensate for past discrimination.

E. APPLICATION PROCESSES FOR COMPETITIVE OR DISCRETIONARY GRANTS

State agencies must disseminate information needed to satisfy the requirements of any application process for competitive or discretionary grants so that all recipients, including those having a high percentage of minority or handicapped students, are informed of and able to seek funds. State agencies that provide technical assistance for the completion of the application process must provide such assistance without discrimination against any one recipient or class of recipients.

F. ALTERATION OF FUND DISTRIBUTION TO PROVIDE EQUAL OPPORTUNITY

If the Office for Civil Rights finds that a recipient's system for distributing vocational education funds unlawfully discriminates on the basis of race, color, national origin, sex, or handicap, it will require the recipient to adopt an alternative nondiscriminatory method of distribution. The Office for Civil Rights may also require the recipient to compensate for the effects of its past unlawful discrimination in the distribution of funds.

IV. ACCESS AND ADMISSION OF STUDENTS TO VOCATIONAL EDUCATION PROGRAMS

A. RECIPIENT RESPONSIBILITIES

Criteria controlling student eligibility for admission to vocational education schools, facilities and programs may not unlawfully discriminate on the basis of race, color, national origin, sex, or handicap. A recipient may not develop, impose, maintain, approve, or implement such discriminatory admissions criteria.

B. SITE SELECTION FOR VOCATIONAL SCHOOLS

State and local recipients may not select or approve a site for a vocational education facility for the purpose or with the effect of excluding, segregating, or otherwise discriminating against students on the basis of race, color, or national origin. Recipients must locate vocational education facilities at sites that are readily accessible to both nonminority and minority communities, and that do not tend to identify the facility or program as intended for nonminority or minority students.

C. ELIGIBILITY FOR ADMISSION TO VOCATIONAL EDUCATION CENTERS BASED ON RESIDENCE

Recipients may not establish, approve or maintain geographic boundaries for a vocational education center service area or attendance zone, (hereinafter "service area"), that unlawfully exclude students on the basis of race, color, or national origin. The Office for Civil Rights will presume, subject to rebuttal, that any one or combination of the following circumstances indicates that the boundaries of a given service area are unlawfully constituted:

1. A school system or service area contiguous to the given service area, contains minority or nonminority students in substantially greater proportion than the given service area;

2. A substantial number of minority students who reside outside the given vocational education center service area, and who are not eligible for the center reside, nonetheless, as close to the center as a substantial number of non-minority students who are eligible for the center;

3. The over-all vocational education program of the given service area in comparison to the over-all vocational education program of a contiguous school system or service area enrolling a substantially greater proportion of minority students: (a) provides its students with a broader range of curricular offerings, facilities and equipment; or (b) provides its graduates greater opportunity for employment in jobs: (i) for which there is a demonstrated need in the community or region; (ii) that pay higher entry level salaries or wages; or (iii) that are generally acknowledged to offer greater prestige or status.

D. ADDITIONS AND RENOVATIONS TO EXISTING VOCATIONAL EDUCATION FACILITIES

A recipient may not add to, modify, or renovate the physical plant of a vocational education facility in a manner that creates, maintains, or increases student segregation on the basis of race, color, national origin, sex, or handicap.

E. REMEDIES FOR VIOLATIONS OF SITE SELECTION AND GEOGRAPHIC SERVICE AREA REQUIREMENTS

If the conditions specified in paragraphs IV. A. B. C. or D. immediately above, are found and not rebutted by proof of nondiscrimination, the Office for Civil rights will require the recipient(s) to submit a plan to remedy the discrimination. The following are examples of steps that may be included in the plan, where necessary to overcome the discrimination (1) redrawing of the boundaries of the vocational education center's service area to include areas unlawfully excluded and/or to exclude areas unlawfully included; (2) provision of transportation to students residing in areas unlawfully excluded; (3) provision of additional programs and services to students who would have been eligible for attendance at the vocational education center but for the discriminatory service area or site selection; (4) reassignment of students, and (5) construction of new facilities or expansion of existing facilities.

F. ELIGIBILITY FOR ADMISSION TO SECONDARY VOCATIONAL EDUCATION CENTERS BASED ON NUMERICAL LIMITS IMPOSED ON SENDING SCHOOLS

A recipient may not adopt or maintain a system for admission to a secondary vocational education center or program that limits admission to a fixed number of students from each sending school included in the center's service area if such a system disproportionately excludes students from the center on the basis of race, sex, national origin or handicap. (Example: Assume 25 percent of a school district's high school students are black and that most of those black students are enrolled in one high school; the white students, 75 percent of the district's total enrollment, are generally enrolled in the five remaining high schools. This paragraph prohibits a system of admission to the secondary vocational education center that limits eligibility to a fixed and equal number of students from each of the district's six high schools.)

G. REMEDIES FOR VIOLATION OF ELIGIBILITY BASED ON NUMERICAL LIMITS REQUIREMENTS

If the Office for Civil Rights finds a violation of paragraph F. above, the recipient must implement an alternative system of admissions that does not disproportionately exclude students on the basis of race, color, national origin, sex, or handicap.

H. ELIGIBILITY FOR ADMISSION TO VOCATIONAL EDUCATION CENTERS, BRANCHES OR ANNEXES BASED UPON STUDENT OPTION

A vocational education center, branch or annex, open to all students in a service area and predominantly enrolling minority students or students of one race, national origin or sex, will be presumed unlawfully segregated if 1) it was established by a recipient for members of one race, national origin or sex, or 2) it has since its construction been attended primarily by members of one race, national origin or sex, or 3) most of its program offerings have traditionally been selected predominantely by members of one race, national origin or sex.

I. REMEDIES FOR FACILITY SEGREGATION UNDER STUDENT OPTION PLANS

If the conditions specified in paragraph IV H are found and not rebutted by proof of nondiscrimination, the Office for Civil Rights will require the recipient(s) to submit a plan to remedy the segregation. *The following are* examples of steps that may be included in the plan, where necessary to overcome the discrimination:

(1) elimination of program duplication in the segregated facility and other proximate vocational facilities; (2) relocation or "clustering" of programs or courses; 3) adding programs and courses that traditionally have been identified as intended for members of a particular race, national origin or sex to schools that have traditionally served members of the other sex or traditionally served persons of a different race or national origin; 4) merger of programs into one facility through school closings or new construction; 5) intensive outreach, recruitment and counseling; 6) providing free transportation to students whose enrollment would promote desegregation.

[Paragraph J omitted]

K. ELIGIBILITY BASED ON EVALUATION OF EACH APPLICANT UNDER ADMISSIONS CRITERIA

Recipients may not judge candidates for admission to vocational education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or handicap. However, if a recipient can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory. Examples of admissions criteria that must meet this test are past academic performance, record of disciplinary infractions, counselors' approval, teachers' recommendations, interest inventories, high school diploma and standardized tests, such as the Test of Adult Basic Education (TABE).

An introductory, preliminary, or exploratory course may not be established as a prerequisite for admission to a program unless the course has been and is available without regard to race, color, national origin, sex, and handicap. However, a course that was formerly only available on a discriminatory basis may be made a prerequisite for admission to a program if the recipient can demonstrate that: (a) the course is essential to participation in the program; *and* (b) the course is presently available to those seeking enrollment for the first time and to those formerly excluded.

L. ELIGIBILITY OF NATIONAL ORIGIN MINORITY PERSONS WITH LIMITED ENGLISH LANGUAGE SKILLS

Recipients may not restrict an applicant's admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction.

Acceptable methods of identification include: (1) identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary.

Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.

M. REMEDIAL ACTION IN BEHALF OF PERSONS WITH LIMITED ENGLISH LANGUAGE SKILLS

If the Office for Civil Rights finds that a recipient has denied national origin minority persons admission to a vocational school or program because of their limited English language skills or has assigned students to vocational programs solely on the basis of their limited English language skills, the recipient will be required to submit a remedial plan that insures national origin minority students equal access to vocational education programs.

N. EQUAL ACCESS FOR HANDICAPPED STUDENTS

Recipients may not deny handicapped students access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. If necessary, recipients must: (1) modify instructional equipment; (2) modify or adapt the manner in which the courses are offered; (3) house the program in facilities that are readily accessible to mobility impaired students or alter facilities to make them readily accessible to mobility impaired students; and (4) provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary handicapped students; (5) provide related aids or services that assure secondary students an appropriate education.

Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory. However, where possible, a recipient must adjust those requirements to the needs of individual handicapped students.

Access to vocational programs or courses may not be denied handicapped students on the ground that employment opportunities in any occupation or profession may be more limited for handicapped persons than for non-handicapped persons.

O. PUBLIC NOTIFICATION

Prior to the beginning of each school year, recipients must advise students, parents, employees and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement, also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity.

If a recipient's service area contains a community of national origin minority persons with limited English language skills public notification materials must be disseminated to that community in its language and must state that recipients will ke steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

V. COUNSELING AND PREVOCATIONAL PROGRAMS

A. RECIPIENT RESPONSIBILITIES

Recipients must insure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or handicap.

B. COUNSELING AND PROSPECTS FOR SUCCESS

Recipients that operate vocational education programs must insure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in in any career or program based upon the student's race, color, national origin, sex, or handicap. Recipients may not counsel handicapped students toward more restrictive career objectives than nonhandicapped students with similar abilities and interests. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or handicapped students, recipients must take steps to insure that the disproportion does not result from unlawful discrimination in counseling activities.

C. STUDENT RECRUITMENT ACTIVITIES

Recipients must conduct their student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap. Where recruitment activities involve the presentation or portrayal of vocational and career opportunities, the curricula and programs described should cover a broad range of occupational opportunities and not be limited on the basis of the race, color, national origin, sex, or handicap of the students or potential students to whom the presentation is made. Also, to the extent possible, recruiting teams should include persons of different races, national origins, sexes, and handicaps.

D. COUNSELING OF STUDENTS WITH LIMITED ENGLISH-SPEAKING ABILITY OR HEARING IMPAIRMENTS

Recipients must insure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

E. PROMOTIONAL ACTIVITIES

Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents' night, shop demonstrations, visitations by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups traditionally have not been represented. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

VI. EQUAL OPPORTUNITY IN THE VOCATIONAL EDUCATION INSTRUCTIONAL SETTING

A. ACCOMMODATIONS FOR HANDICAPPED STUDENTS

Recipients must place secondary level handicapped students in the regular educational environment of any vocational education program to the maximum extent appropriate to the needs of the student unless it can be demonstrated that the education of the handicapped person in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily. Handicapped students may be placed in a program only after the recipient satisfies the provisions of the Department's Regulation, 45 CFR Part 84, relating to evaluation, placement, and procedural safeguards. If a separate class or facility is identifiable as being for handicapped persons, the facility, the programs, and the services must be comparable to the facilities, programs, and services offered to nonhandicapped students.

B. STUDENT FINANCIAL ASSISTANCE

Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

C. HOUSING IN RESIDENTIAL POSTSECONDARY VOCATIONAL EDUCATION CENTERS

Recipients must extend housing opportunities without discrimination based on race, color, national origin, sex, or handicap. This obligation extends to recipients that provide on-campus housing and/or that have agreements with providers of off-campus housing. In particular, a recipient postsecondary vocational education program that provides on-campus or off-campus housing to its nonhandicapped students must provide, at the same cost and under the same conditions, comparable convenient and accessible housing to handicapped students.

D. COMPARABLE FACILITIES

Recipients must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex. This may be accomplished by alternating use of the same facilities or by providing separate, comparable facilities.

Such facilities must be adapted or modified to the extent necessary to make the vocational education program readily accessible to handicapped persons.

VII. WORK STUDY, COOPERATIVE VOCATIONAL EDUCATION, JOB PLACEMENT, AND APPRENTICE TRAINING

A. RESPONSIBILITIES IN COOPERATIVE VOCATIONAL EDUCATION PROGRAMS, WORK-STUDY PROGRAMS, AND JOB PLACEMENT PROGRAMS

A recipient must insure that: (a) it does not discriminate against its students on the basis of race, color, national origin, sex, or handicap in making available opportunities in cooperative education, work study and job placement programs; and (b) students participating in cooperative education, work study and job placement programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex, or handicap in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay.

If a recipient enters into a written agreement for the referral or assignment of students to an employer, the agreement must contain an assurance from the employer that students will be accepted and assigned to jobs and otherwise treated without regard to race, color, national origin, sex, or handicap.

Recipients may not honor any employer's request for students who are free of handicaps or for students of a particular race, color, national origin, or sex. In the event an employer or prospective employer is or has been subject to court action involving discrimination in employment, school officials should rely on the court's findings if the decision resolves the issue of whether the employer has engaged in unlawful discrimination.

B. APPRENTICE TRAINING PROGRAMS

A recipient may not enter into any agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants for membership on the basis of race, color, national origin, sex, or handicap. If a recipient enters into a written agreement with a labor union or other sponsor providing for apprentice training, the agreement must contain an assurance from the union or other sponsor: (1) that it does not engage in such discrimination against its membership or applicants for membership; and (2) that apprentice training will be offered and conducted for its membership free of such discrimination.

VIII. EMPLOYMENT OF FACULTY AND STAFF

A. EMPLOYMENT GENERALLY

Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or handicap. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion or other discrimination against students.

B. RECRUITMENT

Recipients may not limit their recruitment for employees to schools, communities, or companies disproportionately composed of persons of a particular race, color, national origin, sex, or handicap except for the purpose of overcoming the effects of past discrimination. Every source of faculty must be notified that the recipient does not discriminate in employment on the basis of race, color, national origin, sex, or handicap.

C. PATTERNS OF DISCRIMINATION

Whenever the Office for Civil Rights finds that in light of the representation of protected groups in the relevant labor market there is a significant underrepresentation or overrepresentation of protected group persons on the staff of a vocational education school or program, it will presume that the disproportion results from unlawful discrimination. This presumption can be overcome by proof that qualified persons of the particular race, color, national origin, or sex, or that qualified handicapped persons are not in fact available in the relevant labor market.

D. SALARY POLICIES

Recipients must establish and maintain faculty salary scales and policy based upon the conditions and responsibilities of employment, without regard to race, color, national origin, sex or handicap.

E. EMPLOYMENT OPPORTUNITIES FOR HANDICAPPED APPLICANTS

Recipients must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question. Recipients must make reasonable accommodation for the physical or mental limitations of handicapped applicants who are otherwise qualified unless recipients can demonstrate that the accommodation would impose an undue hardship.

F. THE EFFECTS OF PAST DISCRIMINATION

Recipients must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, or sex, or who are handicapped.

G. STAFF OF STATE ADVISORY COUNCILS OF VOCATIONAL EDUCATION

State Advisory Councils of Vocational Education are recipients of Federal financial assistance and therefore must comply with Section VIII of the Guidelines.

H. EMPLOYMENT AT STATE OPERATED VOCATIONAL EDUCATION CENTERS THROUGH STATE CIVIL-SERVICE AUTHORITIES

Where recruitment and hiring of staff for State operated vocational education centers is conducted by a State civil service employment authority, the State education agency operating the program must insure that recruitment and hiring of staff for the vocational education center is conducted in accordance with the requirements of these Guidelines.

IX. Proprietary Vocational Education Schools

A. RECIPIENT RESPONSIBILITIES

Proprietary vocational education schools that are recipients of Federal financial assistance through Federal student assistance programs or otherwise are subject to all of the requirements of the Department's regulations and these Guidelines.

B. ENFORCEMENT AUTHORITY

Enforcement of the provisions of Title IX of the Education Amendments of 1972 and Section 504 of the Rehabilitation Act of 1973 is the responsibility of the Department of Health, Education, and Welfare. However, authority to enforce Title VI of the Civil rights Act of 1964 for proprietary vocational education schools has been delegated to the Veterans Administration.

When the Office for Civil Rights receives a Title VI complaint alleging discrimination by a proprietary vocational education school it will forward the complaint to the Veterans Administration and cite the applicable requirements of the Department's regulations and these Guidelines. The complainant will be notified of such action.

PART 84—NONDISCRIMINATION ON THE BASIS OF HANDICAP IN PROGRAMS AND ACTIVITIES RECEIVING OR BENEFITING FROM FEDERAL FINANCIAL ASSISTANCE

2. In 45 CFR Part 84 Appendix B is added to read as follows:

APPENDIX B—GUIDELINES FOR ELIMINATING DISCRIMINATION AND DENIAL OF SERVICES ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, SEX, AND HANDICAP IN VOCATIONAL EDUCATION PROGRAMS

NOTE.—For the text of these guidelines, see 45 CFR Part 80, Appendix B.

PART 86—NONDISCRIMINATION ON THE BASIS OF SEX IN EDUCATION PROGRAMS AND ACTIVITIES RECEIVING OR BENEFITING FROM FEDERAL FINANCIAL ASSISTANCE

3. In 45 CFR Part 86 Appendix A is added to read as follows:

APPENDIX A—GUIDELINES FOR ELIMINATING DISCRIMINATION AND DENIAL OF SERVICES ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, SEX, AND HANDICAP IN VOCATIONAL EDUCATION PROGRAMS

NOTE.—For the text of these guidelines, see 45 CFR Part 80, Appendix B.

DAVID S. TATEL,
Director, Office for Civil Rights, Department of Health, Education, and Welfare.

MARCH 15, 1979.

COMMENTS AND RECOMMENDATIONS

Over 130 comments and recommendations were received by the Office for Civil Rights in response to the December 19, 1978 publication of proposed Guidelines. (43 FR 59105) Many identified deficiencies that resulted in significant changes to the Guidelines. Each comment was carefully considered before a response was prepared. The following comments and responses are adopted by the Department as a part of the Guidelines.

SUPPLEMENTARY INFORMATION

1. *Comment:* Commenters stated that the Supplementary Information section was unfairly critical of vocational education administrators, relied too heavily on outdated and suspect data, and ignored the advances achieved under the Vocational Education Amendments of 1976.

Response: The objections have merit and changes have been made. The Supplementary Information section has been revised to include current data, to delete outdated and suspect data, to place greater emphasis on OCR investigations and compliance reviews and to acknowledge that vocational education administrators have responded to antidiscrimination measures of the Vocational Education Amendments of 1976.

SECTION I—SCOPE AND COVERAGE

2. *Comment:* Commenters recommended that paragraph I-A state with clarity that the Guidelines apply to all recipients of financial assistance from the Department of Health, Education, and Welfare and not merely to recipients of Federal vocational education funds.

Response: The recommendation is accepted and paragraph I-A has been modified.

3. *Comment:* One commenter suggested that OCR establish a single definition of "recipient" in its Title VI, Title IX and Section 504 regulations to the extent permitted by the underlying legislation.

Response: A single definition of "recipient" would be helpful. However, the change proposed is beyond the scope of the Guidelines project.

4. *Comment:* Commenters requested that the Guidelines state the responsibilities of recipients under the Age Discrimination Act of 1975.

Response: Regulations under the Age Discrimination Act have not yet been issued. The Guidelines will ultimately include coverage of age discrimination.

5. *Comment:* A commenter recommended that paragraph I-C include as an education agency providing vocational education, "the State Board of Vocational Education and/or a State board or body providing vocational education."

Response: Paragraph I-A states that State agency recipients are covered by the Guidelines. Paragraph I-C provides examples of recipients covered by the Guidelines and lists, at I-C(6), "a State agency . . . operating a vocational education facility."

6. *Comment:* Commenters requested that paragraph I(D)(6) and (7) be amended to include "certificate programs."

Response: The suggested change has been adopted.

7. *Comment.* Commenters requested that paragraph I-D list as recipients vocational rehabilitation centers and residential centers.

Response: Paragraph I-D provides examples of covered schools. The Guidelines also apply to vocational rehabilitation centers and residential vocational education centers.

8. *Comment:* One commenter requested a definition of the term "subrecipient."

Response: The term "subrecipient" is defined in paragraph II-B.

SECTION II—RESPONSIBILITIES OF STATE AGENCIES

9. *Comment:* Commenters found paragraph II-B incomplete and vague.

Response: This objection has merit. The paragraph has been substantially revised to clarify State agency responsibilities. Definitions of "technical assistance" and of "compliance review" have been added (paragraph (B)(2) and (3)). The Guidelines now state that the Department, not the State agency, has the responsibility and authority to make formal fact findings and terminate and defer Federal funds.

While these additions to the final Guidelines answer several of the specific questions raised by the commenters much more needs to be done. Within 90 days, the Office for Civil Rights and the Bureau of Occupational and Adult Education will issue memoranda that provide the additional detail necessary for successful State agency compliance activity.

10. *Comment:* Commenters argued that paragraph II-B imposes new requirements on State agency recipients.

Response: State agencies, as well as other recipients of Federal financial assistance, are prohibited from conducting their programs through subrecipients or contractors that discriminate. See for example, 45 CFR Sections 80.3(b), 84.4(b)(4), 86.32(b),(d). The Title VI regulations clearly include a State agency obligation to adopt "methods of administration" for monitoring subrecipients for civil rights compliance.[1] However, this requirement has not been enforced against State education agencies. The Department believes that this must be corrected. To be effective, civil rights compliance activity cannot be the exclusive province of Federal civil rights agencies; it must include Department program agencies (in this case the Bureau of Occupational and Adult Education) and State agencies.

11. *Comment:* Commenters argued that the requirements imposed on State agencies by paragraph II-B are unduly burdensome and costly.

Response: Subparagraph B(1) has been revised to insure that no significant additional data collection or record keeping requirement is imposed on recipients. In addition, the requirement that State agencies investigate complaints has been deleted. Civil rights enforcement, however, must be recognized as important enough to merit the allocation of necessary funds. Federal, State, and local funds and resources available for vocational education must be used for civil rights compliance activities in vocational education programs. The obligations imposed are therefore not unreasonably burdensome.

12. *Comment:* Commenters stated that OCR, through paragraph II-B, is assigning or delegating its enforcement responsibilities to the States.

Response: The Guidelines contemplate a cooperative effort among OCR, the Bureau of Occupational and Adult Education, and State agencies. Their purpose is to add, not substitute, resources for civil rights compliance activity. The Guidelines now clearly state what was always intended: The Office for Civil Rights will not decrease its compliance activity in vocational education programs.

13. *Comment:* Commenters stated that proposed paragraph II-D, which attempted to establish a clear division between State and local responsibilities, was confusing and inconsistent with other sections of the Guidelines. They asked that the paragraph be deleted. It was also suggested that the heading of Section II and the first sentence of paragraph II-A should state that the enumerated requirements are only one aspect of a State agency's responsibilities under the Guidelines.

Response: The suggested changes are adopted as consistent with the intent of the Guidelines.

SECTION III—DISTRIBUTION OF FEDERAL FINANCIAL ASSISTANCE AND OTHER FUNDS FOR VOCATIONAL EDUCATION

14. *Comment:* Commenters argued that protected group persons must be provided "equal opportunity" not merely "opportunity" (paragraph III-A).

Response: This suggestion is accepted. The opportunity for vocational training must be equal for all students without regard to race, color, national origin, sex, or handicap. The provision of unequal facilities, for example, cannot be excused because it is a less than total denial of opportunity.

15. *Comment:* Commenters questioned whether the purpose of proposed paragraph III-B was to prohibit discrimination in the development of a formula (input standard) or in the allocation of funds (output standard). The policy statement in proposed paragraph III-B controlled factors in the formula while the example cited in the paragraph was based on fund allocations.

Response: The Office for Civil Rights may review a formula's components. However, its primary inquiry will be whether the formula has a discriminatory effect on the allocation of funds. Accordingly, the first sentence in paragraph III-B has been rewritten to delete the reference to "factors."

16. *Comment:* Commenters suggested rephrasing paragraph III-B to permit the use of factors that remedy the effects of past discrimination. Others suggested that the Department uphold the use of indicia that enable the State to identify communities entitled to priority under the Vocational Education Act. For example, a State vocational education distribution formula may refer to the number of persons residing in a school district receiving aid to families with dependent children or with limited English speaking ability. The purpose of such a reference is to identify areas either economically depressed or with high concentrations of low-income people.

Response: The suggestions are accepted. Judicial precedent requires recipients to undertake affirmative or remedial action when directed by Congress or in response to a finding of past discrimination. In addition, the adoption of the recommended language confirms that a recipient's use of data on AFDC or LESA populations to comply with the Vocational Education Act is consistent with civil rights authorities.

17. *Comment:* Commenters asked for an explanation of the second sentence in proposed paragraph III-B: "State agencies must apply formula provisions under the Vocational Education Amendments of 1976 in a manner consistent with civil rights authorities." They believe that the statement suggests an inconsistency between civil rights authorities and the targeting provisions of the Vocational Education Act.

Response: The sentence does suggest a tension between the provisions of the Vocational Education Act and civil rights authorities. In fact, they are complementary. Paragraph III-B, as revised, contains the essential language prohibiting discrimination in the application of a formula. The challenged sentence has therefore been deleted.

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[1] HEW plans to propose an amendment to its regulations that confirms that recipients have an identical obligation under Title IX and Section 504. See "Supplementary Information, Part C, State Agency Responsibilities," above.

18. *Comment:* Commenters questioned whether the example used in proposed paragraph III-B (now in III-C) is intended to require equal per-pupil allocations of funds.

Response: Section 106(a)(5)(B)(ii) of the Vocational Education Act prohibits the adoption of a formula seeking equal per-pupil allocations of funds. Rather it requires priority funding for subrecipients serving the greatest concentrations of low income families, for subrecipients least able to pay, and for subrecipients serving the greatest concentrations of students whose education imposes higher than average costs (e.g., handicapped students, students from low-income families, and students from families in which English is not the dominant language). These statutory priorities should result in greater expenditures for communities with concentrations of minority group persons. For this reason the gauge of unlawful discrimination contained in the Guidelines—a finding of lower allocations for communities containing concentrations of minority persons—will generally indicate a high probability of noncompliance.

In addition to an analysis of allocations State-wide, OCR may examine individual districts with substantial numbers of minority students to determine if such districts receive lower per-pupil allocations than the State-wide average.

19. *Comment:* A funding formula will be presumed unlawfully discriminatory if the circumstances recorded in paragraph III-B (now paragraph III-C) are present. Commenters asked for examples of evidence that will rebut the presumption.

Response: Two examples of persuasive rebuttal evidence derive from the Vocational Education Act. First, under Section 106(a)(5)(A)(ii) a State must give priority to funding applications that propose programs new to a service area and that are designed to meet emerging or projected manpower needs and job opportunities. These priorities are not directly related to economic need. Therefore the application of these priorities may in some circumstances be used by a State agency to rebut the presumption of discrimination arising from an inadequate allocation of funds to recipients enrolling a disproportionately high percentage of minorities. Secondly, Section 106(a)(4) requires the distribution of Federal vocational education funds on the basis of annual applications. An eligible recipient that fails to submit an application is prohibited from receiving Federal funds. A similar requirement may control the allocation of State funds under the provisions of a State law. For this reason, the failure of urban or other recipients to apply for funds must be considered before a finding of compliance or noncompliance can be made.

These are only examples of rebuttal evidence that will be considered. Each case must be decided on the basis of a careful analysis of all evidence believed relevant by the recipient and by the Office for Civil Rights.

20. *Comment:* Commenters asked whether the presumption of paragraph III-C will be applied to each type of vocational education program or to combined State allocations; whether Federal and State funds will be examined separately or in combination; whether both operating costs and capital expenditures will be examined; whether the distribution formula will be judged on an annual basis or over a period of years.

Response: Section 106(a)(5) of the Vocational Education Act requires the States to base the distribution of Federal funds on economic, social, and demographic factors relating to the need for vocational education. The Commissioner of Education has ruled in 42 F.R. 53865 (Question #1) that the State's funding formula under section 106(a)(5) must be applied to each of the following Vocational Education Act programs: basic grant (section 120), guidance and counseling (section 134), special programs for the disadvantaged (section 140), and consumer and homemaking programs (section 150). To insure consistency with Office of Education directives under the Vocational Education Act, the Guidelines' requirements may be applied to each of the programs set out above.

The statutory factors listed in section 106(a)(5) of the Vocational Education Act apply to the distribution of Federal vocational education funds. A State may elect to distribute State funds under the same or a different formula. In any event, OCR may separately consider State and Federal allocations to determine whether each is consistent with civil rights authorities.

The distribution formula governs the allocation of all grants to subrecipients under Sections 120, 134, 140, and 150, including those for operating costs and capital expenditures. OCR may therefore examine both operating costs and capital expenditures.

States are required to describe the formula for the distribution of Federal funds in their five year plans (45 CFR 104.182(d)). In applying the gauge of unlawful discrimination to State formulas, OCR may consider expenditures for a single year, or for such other period it finds relevant to whether unlawful discrimination has occurred.

21. *Comment:* A commenter asked whether paragraph III-B (now III-B and III-C) applies to local as well as State agencies. Others asked whether the gauge of compliance, now recorded in paragraph III-C, applies to local agencies.

Respone: Paragraph III-B has been revised to clarify that it applies to all recipients that allocate Federal, State, or local funds among other recipients or schools. Thus, the paragraph applies to local agencies that employ a formula or "other method of allocation" to distribute funds among administrative subdistricts.

The gauge of compliance, recorded in paragraph III-C, refers to a potential misallocation of State and Federal funds. Although this gauge must prove in practice to be a convenient and informative measure, it will tentatively also be used to evaluate allocations of local funds.

22. *Comment:* State agencies argued they could not control the allocation of local funds.

Response: A State agency is not expected to provide protection against an improper allocation of local funds unless it has authority to review or approve local allocations.

23. *Comment:* Commenters argued that OCR lacks authority to monitor State vocational education funds. They argued that paragraph III-B should only control the allocation of Federal funds.

Response: The Department has an obligation to provide protection against unlawful discrimination in any and all facets of a program funded in whole or in part with Federal funds. A recipient of Federal funds may not unlawfully discriminate in the allocation or use of such funds or in the allocation or use of any other funds under its control. Of course, as one commenter notes, if the Department finds it necessary to proceed against any recipient, it may only attempt to defer or terminate HEW Federal funds.

24. *Comment:* Commenters suggested that the phrase "available through Federal funds" (paragraph III-C now III-D), improperly suggests that civil rights authorities apply only to competitive grants or contracts paid for with Federal funds under the Vocational Education Act. They urged that the phrase be deleted.

Response: The suggestion is accepted. A State agency receiving Federal funds may not discriminate in the allocation or distribution of any funds under its control.

25. *Comment:* Commenters thought the example, now recorded in paragraph III-C, should not be referred to in the paragraph relating to competitive grants and contracts.

Response: The example cannot be meaningfully applied to competitive grants and contracts. The reference has therefore been deleted.

26. *Comment:* Commenters suggested that paragraph III-E (now III-F) state that in appropriate circumstances a State may be required to remedy the effects of a prior unlawfully discriminatory distribution of funds.

Response: The Comment is accepted. It is well established that a recipient must remedy past unlawful discrimination and provide protection against like discrimination in the future.

27. *Comment:* Commenters questioned whether paragraph III-E (now III-F) affects the Commissioner of Education's authority to approve or direct a change in the State's method of fund distribution.

Response: If a State system for distributing Federal vocational education funds violates civil rights authorities, the Office of Education and the Office for Civil Rights will jointly seek corrective action.

SECTION IV—ACCESS AND ADMISSION OF STUDENTS

28. *Comment:* Commenters stated that the proposed Guidelines prohibited only future unlawful discrimination. They suggested a prohibition against recipients "maintaining" unlawfully discriminatory practices.

Response: This suggestion is accepted. Recipients must eliminate the effects of past discrimination and ensure nondiscrimination in the future.

29. *Comment:* Commenters suggested that paragraph IV-B be amended to require that sites be accessible to handicapped persons.

Response: The requirement of program accessibility for mobility impaired persons is contained in paragraph IV-N.

30. *Comment:* Commenters argued that new sites should be "equally" accessible rather than "readily" accessible to minority students.

Response: It is generally impossible to find or judge sites "equally" accessible to minority and nonminority communities. Recipients should attempt to locate facilities in perfectly neutral sites; but no change in the Guidelines is required or appropriate.

31. *Comment:* Recipient commenters stated that they often do not have authority to select sites for new facilities.

Response: Recipients that do not have authority to select, review, or approve sites have no obligations under this provision.

32. *Comment:* Commenters objected to paragraph IV-C on the ground that it conflicts with State statutes that limit certain programs offered by a district to students residing within that district.

Response: State laws that limit the admission of students to programs on the basis of residence within a district may be cited by recipients as proof of nondiscrimination. The adequacy or accuracy of that claim will depend upon all of the facts and will vary from State to State and from case to case.

33. *Comment:* Commenters suggested that student reassignment is an additional remedy for site selection and geographic service area violations (proposed paragraph IV-D, now paragraph IV-E).

Response: This suggestion is accepted. For example, if high school vocational education programs are unlawfully segregated because of a geographic zone boundary, the segregation may be remedied through student reassignments.

34. *Comment:* Commenters thought the geographic zoning requirements for secondary vocational schools (paragraph IV-C) should be the same for postsecondary institutions (proposed paragraph IV-E).

Response: Geographic service area or attendance zone boundaries for vocational education centers are generally used at the secondary level. However, paragraph IV-C and IV-E apply to postsecondary institutions that limit admission on the basis of student residence. The separate paragraph for postsecondary institutions has therefore been deleted.

35. *Comment:* Generally, students may not attend an Area Vocational Education School (AVES) unless they reside within one of the school districts participating in the consortium. Commenters objected that paragraph IV-C will result in an unfair requirement that students from nonparticipating districts be admitted to the area school.

Response: In the event the "circumstances" listed in paragraph IV-C arise in a comparison between a consortium and a school district adjacent to a consortium, a recipient(s) may rebut the resulting presumption of unlawful discrimination through proof that compelling reasons justified the inclusion and exclusion of contiguous districts. For example, recipients may demonstrate that an excluded district failed to approve a bond issue needed for the construction of a facility and that all districts included in the consortium approved such a bond issue.

It will not be sufficient for the consortium to prove that all participating districts have approximately the same tax base and that they joined together for that reason. Rather a consortium must prove that an excluded district received a genuine invitation to participate on terms comparable to those offered any other district, and that the offer was declined by the governing authority of the district. If a recipient fails to prove that the planning and formation stages were nondiscriminatory, it will be required to give the excluded district an opportunity to participate in the consortium. Of course, the newly included district may be required to contribute financially and otherwise on the basis of an equitable formula and arrangement.

36. *Comment:* Consortia ask whether paragraph IV-F bars an equal allocation of a facility's student capacity among participating school districts if that allocation results in the disproportionate exclusion of minority group students. Comment No. 35 addresses an issue illustrated by the exclusion of a city school system from an essentially suburban consortium. The issue in this comment, is illustrated by a consortium of a majority black city school system and four majority white suburban districts that equally share a vocational education facility with a capacity of 500 students. Inequality results from this agreement if the city system's student enrollment is substantially greater than its suburban partners. Thus if each participant in this five district consortium is allocated 100 student spaces in the vocational education center, each suburban district may have only 1,000 students competing for 100 spaces while the city system may have 2,000 students competing for 100 spaces. Students in the city system do not have equal opportunity for admission to the vocational education center.

Response: This provision (IV-F) applies to both separate school districts and consortia. However, a consortium may allocate available spaces in the manner described in this comment if it proves that compelling reasons similar to those discussed in comment 35 above, justify the allocation.

37. *Comment:* Commenters asked whether paragaph IV-C may result in a requirement that a school district admit to its vocational education facilities students who reside in an entirely separate school district.

Response: Paragraph IV-C and IV-F apply primarily to discrimination within a school district and to consortia as discussed in comments 35 and 36. A legally consitituted separate school district providing vocational education only to students residing within its borders is not required by paragraph IV-C to admit nonresident students. However, in the event a State establishes a "vocational education district" composed of several school districts, the boundaries of the vocational education district are subject to review under paragraph IV-C.

38. *Comment:* Commenters objected that paragraph IV-H was unreasonable and unrealistic in presuming that segregated facilities, courses and programs resulted from recipient practices rather than student choice. Others urged that the paragraph contain an additional specific presump-

tion of unlawful discrimination if a school were established for members of one race, sex or national origin and continues to be so attended. Such commenters asked for a rule holding that the only permissible remedy for segregation in such a school is relocation of courses and programs to other schools.

Response: Both comments have some merit and have led to a rewriting of the paragraph. Vocational education administrators are quite correct in arguing that specific vocational courses and programs are generally elected by, not required of, students. Consequently, segregation may result from parental, community and peer group influences that are beyond their control. This fact is generally recognized by Section IV of the Guidelines: each paragraph identifies a method or factor controlling student eligibility *other than student choice* and attempts to provide protection against the unlawful exclusion of students based upon that factor. Thus, a student's ineligibility based upon residence (paragraph IV-C) or because the facility was located too far from his or her home (paragraph IV-B) or because he or she scored too low on an admissions test (paragraph IV-K) is addressed by the Guidelines. Proposed paragraph IV-H departed from this theme. Rather than identify a specific device that resulted in the exclusion of students despite their desire to enroll, the paragraph proposed a presumption of unlawful discrimination whenever a facility or course was segregated. This was unreasonable, and the general presumption has been deleted.

However, the other commenters are also correct in stating that the Guidelines fail to identify another factor or device that can interfere with a student's choice. A recipient may have constructed a facility for members of one race or sex and may not have taken meaningful action to remedy the segregation. In such cases, it is unreasonable to state that the school continues to be segregated as a result of student choice. The analogy to racial segregation in elementary and secondary public schools is perfect: by the late 1960's Federal courts were consistently holding that school officials were not adequately desegregating their dual racial systems when, after 100 years of enforced segregation, they merely opened the doors of their white schools and announced that black students could apply for admission. Paragraph IV-H has accordingly been rewritten to hold that if a facility was established for minorities, or for one race, national origin or sex and it continues to be essentially segregated despite open enrollment, additional steps to desegregate the facility are necessary. However, the suggestion that a specific remedy should be required of a school established as a segregated facility, is not accepted. The efficacy of any proposed remedy will vary from case to case.

39. *Comment:* Commenters stated that there should not be a violation of paragraph IV-H if a protected group is represented in a facility in proportion to its representation in the service area.

Response: This comment is accepted. Evidence that members of a protected group attend a facility in proportion to their representation in the service area will be accepted as evidence of that group's nondiscriminatory enrollment in the facility. However, the boundaries of the service area must satisfy the requirements of paragraph IV-C.

40. *Comment:* Commenters suggested that in paragraph IV-H underrepresentation, not nonparticipation, should be the standard; that discrimination based on national origin was improperly omitted from paragraphs IV-F and IV-H.

Response: These suggestions merely urge consistency among several provisions and identify inadvertent errors. The suggested changes have been made.

41. *Comment:* Commenters urged that handicapped persons be protected by paragraph IV-H.

Response: A vocational education center, branch or annex enrolling only handicapped students is often permissible under the Department's Section 504 regulation (e.g. a school for autistic children). Each secondary level student must be individually evaluated and then assigned to a program responsive to his or her individual needs. For this reason the presumption recognized in paragraph IV-H cannot routinely protect handicapped persons. Nevertheless, under the requirements of paragraphs IV-N and VI-A, secondary level handicapped students may be placed in segregated annexes, branches or centers only if their individualized education plans state that they cannot be trained in a regular program with "supplementary aids and services."

42. *Comment:* Commenters suggested that the proposed validation standard of paragraph IV-K would permit recipients to use criteria that disproportionately exclude minorities or handicapped persons merely by demonstrating that the students admitted were more likely to succeed in the program. This would allow recipients, for example, to exclude protected persons from the attractive trade and technical programs through evidence that a "C" average student is less likely to excel in a program than an "A" average student. The commenters suggested that screening criteria to be permissible, must be "essential to participation" in a program.

Response: This suggestion is accepted. One of the principal objectives of the Vocational Education Act is to provide protected group persons the training they need to obtain employment. Screening criteria or standards that have the effect of disproportionately excluding such persons from vocational education programs must therefore be validated as essential to satisfactory completion of course requirements. The use of criteria like grade point average, to justify priority admission of students with exceptional attainments or scores may disproportionately exclude protected group persons. If such disproportionate exclusion occurs the criteria or standards must be validated as essential to participation in a program *before* they may be used by a recipient.

43. *Comment:* Commenters sought to expand paragraphs IV-L and IV-M. They argued that recipients should be required to provide native language programs, English language instruction and other diverse methods of instruction where there are high concentrations of persons with limited English language skills.

Response: The changes proposed are beyond the scope of the Guidelines project. The requirements of the Guidelines are consistent with established Office for Civil Rights secondary school policy.

44. *Comment:* Commenters objected to the failure of paragraph IV-D, (I) and (M) (now E, I, and M) to include deadlines for the submission of acceptable remedial plans.

Response: The Office for Civil Rights will establish time periods for the submission of remedial plans on a case by case basis.

45. *Comment:* Commenters thought the public notification paragraph, IV-O, fails to ensure adequate notice of vocational education opportunities. Others thought the proposed provision was too burdensome; they found the requirement of notice to limited English proficiency persons particularly objectionable.

Response: The requirement that recipients announce a policy of nondiscrimination has several components: 1) the notice must be continuing; 2) it must be designed to reach a recipient's beneficiaries and employees, and potential beneficiaries and employees, particularly members of protected groups; 3) it must state the policy of nondiscrimination; 4) it must include the name, telephone number, and address of a person who can provide additional information on the policy of nondiscrimination. The proposed provision for notification was deficien with respect to requirement number 4 the final Guidelines have been revised accordingly.

The Department agrees with the commenters who found too onerous the requirement of notice of "all program offerings and admissions criteria." It has been substantially revised. Also, notice to national origin minorities with limited English speaking ability is now required only if a service area contains a "community" of such persons.

46. *Comment:* Commenters asked whether affirmative action programs were permissible or required.

Response: Appropriate remedial action (sometimes referred to as "affirmative action") must be undertaken to overcome the effects of past discrimination. Also, certain voluntary affirmative action measures are permissible under the Department's Title VI, Title IX, and Section 504 regulations, when a recipient finds such measures useful or necessary to correct societal discrimination or patterns of segregation and nonparticipation. the Secretary and the President have issued statements urging recipients to adopt and continue voluntary affirmative action programs in admissions, recruitment, counselling, and employment.

47. *Comment:* A commenter asked whether children attending private racially discriminatory academies may also attend Federally assisted vocational schools.

Response: On April 26, 1976, the Office for Civil Rights announced that "children enrolled in a non-public school cannot participate in the public school program if the non-public school engaged in discriminatory practices prohibited by Title VI. Even though the non-public school is not a recipient, any discriminatory practices by it would . . . directly affect the Federally assisted program." 41 F.R. 35553 (August 23, 1976).

SECTION V—COUNSELING AND PREVOCATIONAL PROGRAMS

48. *Comment:* Commenters recommended that recipients be required to provide inservice training for counsellors on the needs of minorities, the handicapped, and students stereotyped on the basis of sex.

Response: Inservice training is an approved method for instructing professional staff on the forms of discrimination experienced by students. However, recipients may obtain compliance through other methods.

49. *Comment:* Proposed paragraph V-B provided that disproportionate enrollments based on sex must be examined to verify that they do not result from discrimination in counselling. Commenters asked that disproportionate enrollments based on race or national origin lead to a similar examination of counselling practices.

Response: The suggestion is accepted and paragraph V-B has been revised.

50. *Comment:* Commenters urged that paragraph V-E endorse affirmative promotional and outreach activities.

Response: The recommendaton is accepted. Voluntary affirmative action in promotional and counselling activities is endorsed through comment number 46.

51. *Comment:* Commenters found "unrealistic" the prohibition against counselling handicapped students toward limited career objectives (paragraph V-B).

Response: This provision allows a recipient to advise handicapped students of the difficulties they may encounter in fields not traditionally opened to them. However, the provision requires that recipients do more than merely state that such obstacles exist. The recipient must provide students with information on available vocational opportunities, on the responsibilities of an employer under Section 504, and on available remedies in the event of discrimination. Information or materials that may assist recipients in meeting this responsibility are available from the Office for Civil Rights, Office of Program and Review and Assistance.

SECTION VI—EQUAL OPPORTUNITY IN THE VOCATIONAL EDUCATION INSTRUCTIONAL SETTING

52. *Comment:* Commenters recommended several changes to this section: A) "Mainstreaming" handicapped students should not be a priority; B) Sex restricted financial assistance, even subject to the conditions specified in paragraph VI-B, should be impermissible; C) Additional detail should be provided in paragraph VI-C to provide protection against unlawful discrimination; D) A new section should be added to announce recipient obligations to national origin minority persons with limited English speaking ability.

Response: The primary purpose of Section VI of the Guidelines is to record several provisions of the Department's Title IX and Section 504 regulations that deserve emphasis in light of findings in OCR compliance reviews and complaint investigations. Proposed changes "A" and "B" are inconsistent with the Department's regulations and therefore beyond the scope of the Guidelines project; suggestion "C" is meddlesome in that it seeks to regulate recipients aimlessly; proposed change "D" seeks a provision already included in another section of the Guidelines.

SECTION VII—WORK STUDY, COOPERATIVE VOCATIONAL EDUCATION, JOB PLACEMENT, AND APPRENTICE TRAINING

53. *Comment:* Commenters argued that the requirements of Section VII are too burdensome. They believe that Congress never intended recipients to monitor employers and unions for discrimination.

Response: Vocational education administrators misperceive the nature of Section VII requirements. Under the Department's civil rights regulations recipients are prohibited from engaging in any service, activity, or program in a discriminatory manner. Work study, cooperative education, and job placement are recipient programs or activities and for this reason may not be marred by unlawful discrimination. There is evidence, for example, that school officials are honoring requests from employers for persons of a particular race or sex or for persons free of handicaps. This is unlawful discrimination by both the recipient and the employer. Moreover, the Congress is not mindless; it does not enact idle legislation. It would not appropriate more than a half billion dollars annually under the Vocational Education Act for both nondiscriminatory job training programs and discriminatory job placement programs.

54. *Comment:* Commenters suggested that the Guidelines require recipients to obtain an assurance of nondiscrimination from employers that participate in cooperative education, work study, and job placement programs. Others suggested that paragraph VII-A should require school officials to collect, review, and maintain data reflecting the race, sex, national origin, and handicap of students participating in these programs.

Response: The addition of a written assurance to existing written agreements (e.g., cooperative vocational education agreements) is a reasonable and useful measure. This requirement has been added to the Guidelines. To date, OCR investigators have not been frustrated by inadequate recipient records, and the data collection suggestion is therefore not accepted.

55. *Comment:* Commenters urged that paragraph VII be rewritten to allow potential employers to discriminate on the basis of handicap if the handicap prevents a person from performing the job. One commenter stated, for example, that a roofing company need not hire an individual with no legs as a roofer since the job requires an ability to climb a ladder carrying 90 pounds of materials.

Response: Employers may not discriminate on the basis of handicap against otherwise *qualified* handicapped persons. Prospective employers are permitted to make preemployment inquiries into an applicant's ability to perform job-related functions. Note, however, that employers are required to "reasonably accommodate" the special needs of a handicapped employee or applicant for employment if it does not result in an "undue hardship" for the employer. In the example provided by the commenter, a small roofing concern would probably be unduly burdened by the accommodation necessary for this handicapped person. However, in contrast, a major university will not experience "undue hardship" if it provides a reader for a blind applicant for employment. See paragraph VIII-E of the Guidelines. Additional information on the principles of "undue hardship" and "reasonable accommodation" can be obtained from the Office for Civil Rights, Office of Program Review and Assistance.

56. *Comment:* Commenters objected to the phrasing in paragraph VII-A suggesting that a recipient must control an employer's policies and practices.

Response: A recipient cannot control the policies or practices of an employer. However, a recipient must determine whether an employer discriminates and if necessary divorce itself—its programs and activities—from the discriminating employer.

57. *Comment:* Commenters asked whether recipients are prohibited from entering work study and cooperative education agreements with employers that have remedied their discriminatory policies and practices.

Response: Recipients are free to enter into agreements with such employers.

58. *Comment:* A commenter argued that prospective employers in cooperative placement activities should not be covered by these Guidelines because they are "ultimate beneficiaries" under 45 CFR § 84.3(f).

Response: The requirements of the Guidelines apply to recipients of Federal funds, not to prospective employers. Recipients must take measures to free their programs and activities of employers who unlawfully discriminate. It is unnecessary, therefore, to determine whether prospective employers are "ultimate beneficiaries."

59. *Comment:* Commenters asked whether the requirement of nondiscrimination in apprentice training applies only to programs sponsored by unions.

Response: Paragraph VII-B applies to registered and non-registered apprentice training programs whether sponsored by a union, an individual employer, a group of employees, an employer-employee committee, or a governmental agency. The text of paragraph VII-B has therefore been revised to cover a "labor union or other sponsor." Also, all sponsors of apprentice programs are subject to the Department of Labor Guidelines for Nondiscrimination in All Apprenticeship Programs (29 CFR Part 30).

SECTION VIII—EMPLOYMENT OF FACULTY AND STAFF

60. *Comment:* Commenters argued that the Department's Title VI employment jurisdiction extends only to employees who work directly with students. They state that the Department has no authority to act on complaints of employment discrimination against "administrators or applicants for employment."

Response: The Guidelines have been revised to reflect the Department's current interpretation of its authority. If and when it is revised or modified, the new policy will be announced and will supersede the Guidelines.

61. *Comment:* Commenters stated that the Department has no authority to accept or resolve employment discrimination complaints under Title IX.

Response: The Guidelines reflect the Department's current interpretation of its authority. Several cases raising this issue are now pending in the courts of appeal. If and when this litigation results in controlling holdings that the Department has no employment jurisdiction under Title IX, the Department's regulations and these Guidelines will be revised.

62. *Comment:* Commenters suggested that under a recent decision of the United States Court of Appeals for the Fourth Circuit, *Trageser* v. *Libbie Rehabilitation Center*, — F.2d — (4th Cir. 1978), the Department has no authority to accept or resolve employment discrimination complaints under Section 504.

Response: The Guidelines reflect the Department's current interpretation of its authority. If and when it must be revised to conform to controlling judicial decisions, the new policy will be announced and will supersede the Guidelines.

63. *Comment:* Commenters stated that the definition of a "qualified handicapped" person under Section 504 of the Rehabilitation Act and the Guidelines is at odds with the Department of Labor's definition under Section 503 of the Rehabilitation Act.

Response: The Department of HEW is presently reviewing with the Department of Labor the inconsistencies between their definitions. The Guidelines reflect the Department's current view. If and when it is revised or modified, the Department's regulation and these Guidelines will be revised.

64. *Comment:* Commenters objected to paragraph VIII-F on the ground that it establishes requirements inconsistent with *Bakke*.

Response: The Guidelines require remedial action to overcome the effec of past discrimination. *Bakke* permi among other activities, such "affirmative action."

65. *Comment:* Commenters objected to paragraph VIII-C as "presuming guilt" before an investigation is conducted.

Response: Although alternative language was considered, no change has been made in the Guidelines. It is not the intention nor the effect of the Guidelines to make baseless presumptions or findings. Rather, statistical patterns result in inferences that additional evidence may rebut. The Office for Civil Rights will not find unlawful discrimination solely on the basis of statistical data or without affording a recipient an opportunity for rebuttal.

66. *Comment:* Commenters urged that the Guidelines require recipients to maintain and submit data on its employment practices.

Response: This suggestion was rejected. Records maintained and submitted by recipients under other authorities have satisfied the needs of OCR investigators.

67. *Comment:* Commenters asked whether this section applies to State agencies.

Response: All recipients of Federal financial assistance from the Department, as specified in Section I, are covered by Section VIII. This also e plains the requirement of paragra II-A(4).

68. *Comment:* Commenters stated that paragraph VIII-C should recognize that a recipient may rebut a presumption of unlawful employment discrimination through evidence that qualified persons of a protected group were not available to the individual school district nor to the vocational education center.

Response: Rebuttal evidence may include proof that: (1) Members of a protected group were recruited without success; or (2) Identified persons of a protected group were offered employment opportunities that were declined.

SECTION IX—PROPRIETY VOCATIONAL EDUCATION SCHOOLS

69. *Comment:* A commenter argued that a tuition grant or loan to a student in attendance at a proprietary school is not Federal financial assistance to the proprietary school. Rather it is compensation paid for a direct service—a "procurement contract." It is argued that proprietary schools are therefore not subject to the Department's regulations or these Guidelines.

Response: The Department has long defined the term "recipient" under Title VI, Title IX and Section 504 include proprietary (i.e., other th public or nonprofit) educational institutions that receive tuition from students participating in Federal tuition grant programs. It is beyond the scope of the Guidelines project to reconsider established Department policy.

DAVID S. TATEL,
Director,
Office for Civil Rights.

March 15, 1979.

[FR Doc. 79-8561 Filed 3-20-79; 8:45 am]

☆U.S. GOVERNMENT PRINTING OFFICE: 1979 281-241/5005 1-3

Brian F. Weber
"Not discriminated against"

Quota system for minorities OK'd by court

WASHINGTON (AP) — The Supreme Court, in a ruling that could affect millions of working Americans, said Wednesday employers voluntarily may give minority workers special treatment in hiring, training and promotion.

Voting 5-2, the justices provided a momentous victory for advocates of "affirmative action" programs for minorities by allowing even employers with no proven history of racial bias to offer the special preferences.

Employers with a proven history of racial bias can be required by the government to offer special preferences.

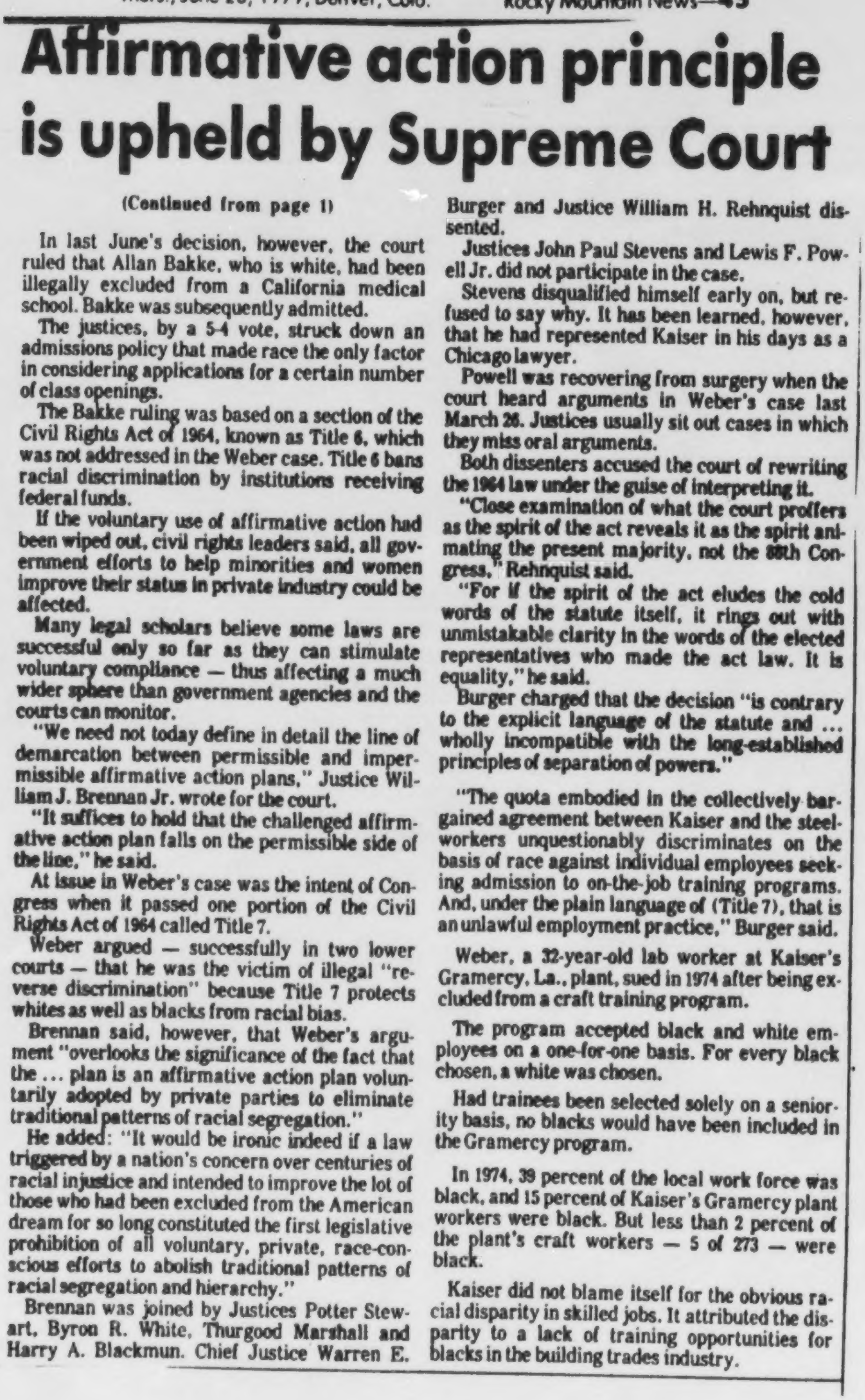
The court said racial quotas may be used in the special preference programs, but offered scant guidance for lower courts as to when quotas are permissible.

Specifically, the court said the Kaiser Aluminum & Chemical Co. did not discriminate illegally against Brian F. Weber, a white Kaiser employee in Louisiana, by adopting a plan "to eliminate traditional patterns of racial segregation."

The on-the-job training program, begun by Kaiser in conjunction with the United Steelworkers union, was aimed at placing more blacks in higher paying positions.

The court's decision did not discuss sexual discrimination. But because it was based on a federal law that bans sexual bias as well as racial bias in employment, the ruling also represents a big victory for the women's rights movement.

Weber's case was seen by civil rights leaders as potentially far more important than last June's decision in the Bakke case, in which the court upheld the idea that race may be taken into account in a university's admissions decisions.



Thurs., June 28, 1979, Denver, Colo. Rocky Mountain News—45

Affirmative action principle is upheld by Supreme Court

(Continued from page 1)

In last June's decision, however, the court ruled that Allan Bakke, who is white, had been illegally excluded from a California medical school. Bakke was subsequently admitted.

The justices, by a 5-4 vote, struck down an admissions policy that made race the only factor in considering applications for a certain number of class openings.

The Bakke ruling was based on a section of the Civil Rights Act of 1964, known as Title 6, which was not addressed in the Weber case. Title 6 bans racial discrimination by institutions receiving federal funds.

If the voluntary use of affirmative action had been wiped out, civil rights leaders said, all government efforts to help minorities and women improve their status in private industry could be affected.

Many legal scholars believe some laws are successful only so far as they can stimulate voluntary compliance — thus affecting a much wider sphere than government agencies and the courts can monitor.

"We need not today define in detail the line of demarcation between permissible and impermissible affirmative action plans," Justice William J. Brennan Jr. wrote for the court.

"It suffices to hold that the challenged affirmative action plan falls on the permissible side of the line," he said.

At issue in Weber's case was the intent of Congress when it passed one portion of the Civil Rights Act of 1964 called Title 7.

Weber argued — successfully in two lower courts — that he was the victim of illegal "reverse discrimination" because Title 7 protects whites as well as blacks from racial bias.

Brennan said, however, that Weber's argument "overlooks the significance of the fact that the ... plan is an affirmative action plan voluntarily adopted by private parties to eliminate traditional patterns of racial segregation."

He added: "It would be ironic indeed if a law triggered by a nation's concern over centuries of racial injustice and intended to improve the lot of those who had been excluded from the American dream for so long constituted the first legislative prohibition of all voluntary, private, race-conscious efforts to abolish traditional patterns of racial segregation and hierarchy."

Brennan was joined by Justices Potter Stewart, Byron R. White, Thurgood Marshall and Harry A. Blackmun. Chief Justice Warren E. Burger and Justice William H. Rehnquist dissented.

Justices John Paul Stevens and Lewis F. Powell Jr. did not participate in the case.

Stevens disqualified himself early on, but refused to say why. It has been learned, however, that he had represented Kaiser in his days as a Chicago lawyer.

Powell was recovering from surgery when the court heard arguments in Weber's case last March 28. Justices usually sit out cases in which they miss oral arguments.

Both dissenters accused the court of rewriting the 1964 law under the guise of interpreting it.

"Close examination of what the court proffers as the spirit of the act reveals it as the spirit animating the present majority, not the 88th Congress," Rehnquist said.

"For if the spirit of the act eludes the cold words of the statute itself, it rings out with unmistakable clarity in the words of the elected representatives who made the act law. It is equality," he said.

Burger charged that the decision "is contrary to the explicit language of the statute and ... wholly incompatible with the long-established principles of separation of powers."

"The quota embodied in the collectively bargained agreement between Kaiser and the steelworkers unquestionably discriminates on the basis of race against individual employees seeking admission to on-the-job training programs. And, under the plain language of (Title 7), that is an unlawful employment practice," Burger said.

Weber, a 32-year-old lab worker at Kaiser's Gramercy, La., plant, sued in 1974 after being excluded from a craft training program.

The program accepted black and white employees on a one-for-one basis. For every black chosen, a white was chosen.

Had trainees been selected solely on a seniority basis, no blacks would have been included in the Gramercy program.

In 1974, 39 percent of the local work force was black, and 15 percent of Kaiser's Gramercy plant workers were black. But less than 2 percent of the plant's craft workers — 5 of 273 — were black.

Kaiser did not blame itself for the obvious racial disparity in skilled jobs. It attributed the disparity to a lack of training opportunities for blacks in the building trades industry.

UNDERUTILIZATION

IV

POLICIES

GOALS

OBJECTIVES

V

SAMPLE POLICY

The _________ school district hereby adopts the following policy.

> No student or employee of School District _________ shall be subject to limitations to vocational interests, aspirations or opportunities as the result of policies or practices which result in underutilization or from sex bias, sex stereotyping or sex discrimination as defined in Title II of PL 94-482.
>
> It shall further be the intent of _________ School District to initiate affirmative steps and positive action toward eliminating sexual inequities in all programs, projects, activities, print and nonprint materials and services provided at every level of education, including elementary, secondary, postsecondary and related adult vocational programs and activities.

SAMPLE GOAL

The District Goal is to achieve a _________ (enter percent) minimum nontraditional enrollment in all vocational programs by _________ (enter time frame).

Objectives:

(a) to take three action steps to develop community awareness/sensitivity toward nontraditional roles within _________ (enter time frame).

(b) to generate community support for three action steps which provide for nontraditional career development within _________ (enter time frame).

(c) to implement a plan to eliminate sex bias, sex stereotyping and discrimination from vocational education to include:

- recruiting, selecting, placing
- instructional program
  - curriculum
  - instructional methodologies
  - facilities, equipment, supplies
- support services to protected groups as appropriate
  - counseling
  - guidance
  - support networks
  - child care
- job location, obtainment and retention
  - coordination, communication by school staff with business, industry and labor to provide assistance to protected groups

(d) to conduct annual evaluation of progress made in terms of:

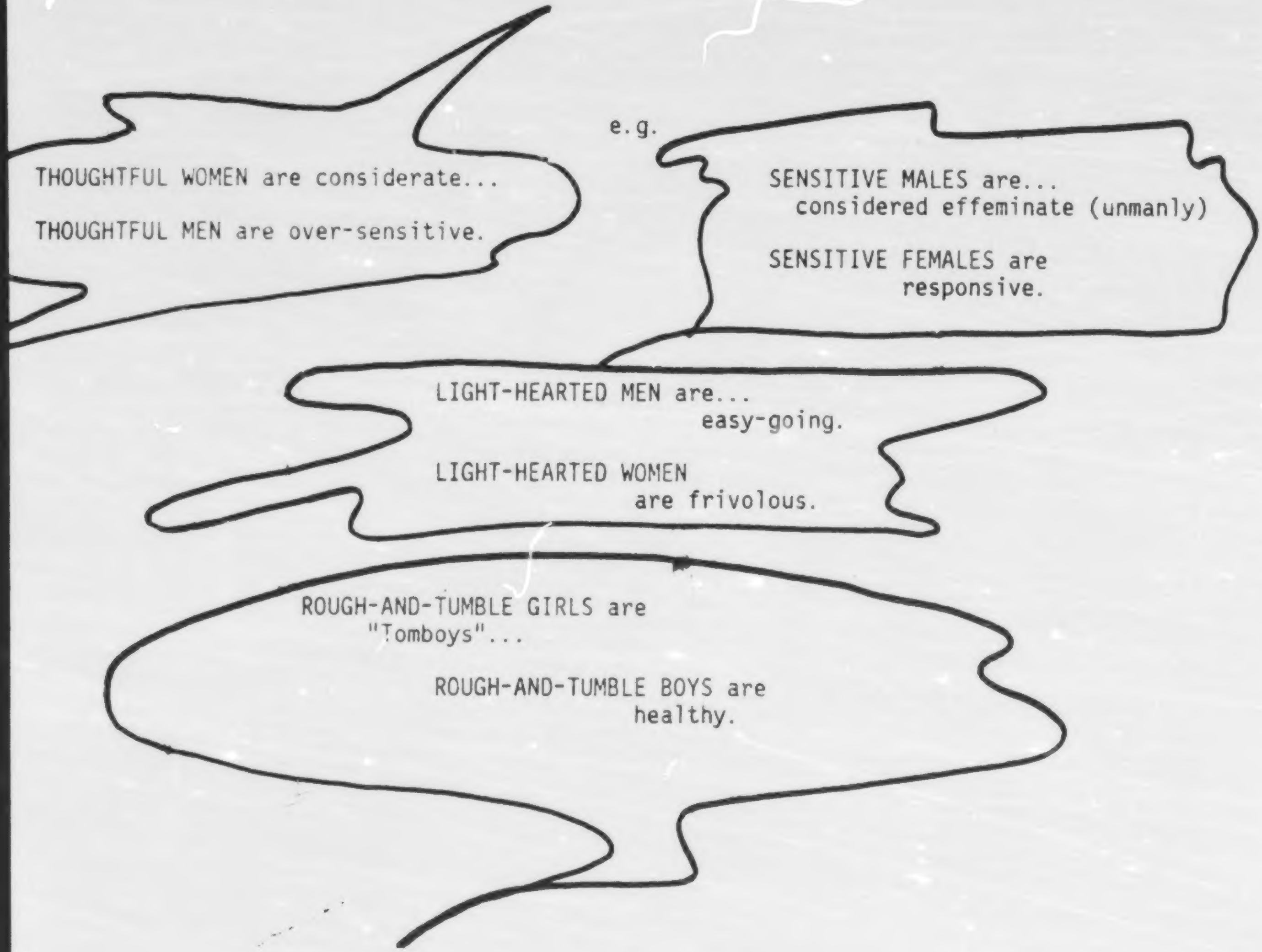
- -- enrollments, completions, placements and job retention and job satisfaction of minorities
  - - as historical progress
  - - as related to total population of community served
- -- staffing (instructional and administration) patterns

SBDL 42 sa
(7/17/79)

ACTION PLANNING

VI

WHAT I DO (CAN DO) TO ELIMINATE SEX STEREOTYPING



e.g.

THOUGHTFUL WOMEN are considerate...

THOUGHTFUL MEN are over-sensitive.

SENSITIVE MALES are...
considered effeminate (unmanly)

SENSITIVE FEMALES are
responsive.

LIGHT-HEARTED MEN are...
easy-going.

LIGHT-HEARTED WOMEN
are frivolous.

ROUGH-AND-TUMBLE GIRLS are
"Tomboys"...

ROUGH-AND-TUMBLE BOYS are
healthy.

ADMINISTRATIVE STRATEGIES FOR SEX EQUITY

The following strategies can be used by educators to overcome sex bias and sex-role stereotyping:

1. Develop policies, procedures, guidelines for eliminating sex bias, sex stereotyping and sex discrimination.
2. Collect data and analyze underutilization of administrators, staff, students by sex.
3. Establish numerical objectives and timelines to increase representation of the underutilized.
4. Set up an action plan to remediate the effects of past stereotyping, bias and/or discrimination which might include activities such as:
    - a. Become familiar with the various publishers guidelines that address these issues and use them.
    - b. Require all new materials previewed before purchasing. Eliminate those materials that are sexist before purchasing.
    - c. Encourage counselors and teachers to become active in providing group sessions that address these issues.
    - d. Give students the opportunity to explore the "real world" -- making certain that biased or stereotyped happenings or situations are identified and discussed.
    - e. Require staff to encourage all students to consider a variety of occupational roles, regardless of sex. They should be as honest about the rewards and limitations that exist in nontraditional occupations as they are with traditional occupations. Demand consistency.
    - f. Encourage staff to assist students to see themselves and adults of both sexes in multiple family and personality roles.
    - g. Encourage staff to help all students develop an awareness of the sex bias and sex-role stereotyping that exists in instructional materials, the media, and in the world of work.

SBDL 52 sa
(7/24/79)

STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION

VOCATIONAL EDUCATION
EQUAL ACCESS
PLAN OF ACTION--RECOMMENDED PROCEDURES

1. Collect data by sex:
   - Student enrollments - aggregate
     - by occupational program
   - Staff patterns - aggregate
     (Salaries and levels of position) - by occupational program
   - Administrative
     (Salaries and levels of position) - aggregate
     - by levels

2. Determine "available pool" (see narrative/samples on underutilization).

3. Analyze data to determine where underutilization occurs now and where a pattern of underutilization exists.

4. Develop numerical objectives and timelines in order to remediate underutilization. (See sample)

5. Develop strategies (see sample) to be implemented.

6. Develop an action plan to include:
   - Goal
   - Objective
   - Steps in achieving the objective
   - Completion criteria
   - Responsible party
   - Completion date
   - Anticipated problems in achieving the objective
   - Approach to overcome problems

7. Evaluate progress annually and repeat cycle (steps 1-7).

SBDL 53 cw

CATEGORIZING AND ANALYZING STAFFING AND STUDENTS TO IDENTIFY UNDERUTILIZATION IN VOCATIONAL EDUCATION

Directions: Complete form by inserting appropriate numbers, analyze in relationship to ratios in the population or the labor market.

	Totals		Population Ratios		Labor Market Ratios		Underutilizati	
Category	Female	Male	Female	Male	Female	Male	Female	Male
Advisory								
Council								
Committees								
Administrative Office								
Administrative Staff								
Non-Admin. Prof. Staff								
Clerical								
Total								
School Personnel								
Teachers								
Counselors								
Job Developers								
Other Non-Teaching Support Staff								
Vocational Students								

1. Insert numbers (and percentage) of females and males in each category.
2. Insert population and labor market percentages. (Define availability pool--recruitment source)
3. Determine underutilization.
4. Use as a basis of setting numerical objectives and timelines.

NOTE: Narrative on underutilization may be helpful.

SBDL 48 pm

PLAN OF ACTION

GOAL: ______________________________

OBJECTIVE: ______________________________

A. Steps in achieving objective	B. Completion Criteria	C. Responsible Party	D. Completion Date	E. Anticipated Problems in achieving objective	F. Approach to overcome problems

TOOLS FOR ASSESSMENT

VII

SAMPLES OF MANIFESTATIONS OF SEX BIAS AND DISCRIMINATION IN VOCATIONAL EDUCATION WITH CORRESPONDING EXAMPLES

ADMINISTRATORS

Administrative Policies and Procedures

-- a policy or practices which result in underrepresentation or exclusion of males from home economics and females from trade and industrial programs

-- scheduling classes in home economics which are made up of all male or all female students

Print and Nonprint Materials Used for Communication With Community, Staff, or Students

-- a staff recruiting brochure showing photographs of teachers in sex traditional instructional areas

-- sexist language such as the use of generic "man" as in chairman or shop foreman

Interaction With Staff and Students Verbal and Non-Verbal

-- complimenting female staff primarily for their appearance; male staff, for job performance

-- using flirting behaviors (winking, touching, joking) in an attempt to establish rapport with opposite sex staff members

Behavioral Expectations Set For Staff and Students

-- expecting male teachers to be better disciplinarians, thereby assigning only males to monitor situations in which trouble might develop

-- expecting female teachers to be emotional under pressure; male teachers, to be stoic

Evaluation of Staff

-- evaluating male and female teachers using different criteria

-- showing preference for staff of one sex by giving them more positive evaluations

SBPG 7 sa
(5/23/79)

SEX FAIRNESS
SELF-ASSESSMENT FOR VOCATIONAL ADMINISTRATORS AND TEACHERS

Instruction:

Read each lettered statement below and check the appropriate introductory words which represent your current status or intent.

(Check one of the columns below.)

	I am unable to impact	I have	I will
a.			
b.			
c.			
d.			
e.			
f.			
g.			
h.			
i.			
a.			
b.			

Females

a. ...encourage(d) them in a wide range of job choices, including traditional male occupations

b. ...motivate(d) them toward leadership positions and job goals that lead to the highest levels of responsibility

c. ...provide(d) detailed assistance with scholarship and loan applications and opportunities

d. ...assure(d) equal distribution of scholarships

e. ...made(make) an all-out effort to understand barriers that females raise for themselves in response to socialization pressures

f. ...schedule(d) discussion groups about mutual problems future alternatives

g. ...subscribe(d) to some of the women's publications (e.g., The Spokeswoman, Working Woman, etc.)

h. ...ask(ed) interesting and knowledgeable women in the community to talk with large and small groups

i. ...provide(d) realistic information about their probable futures (i.e., many may expect to assume financia and household responsibilities)

Males

a. ...encourage(d) them in a wide range of job options, including traditional female occupations

b. ...help(ed) them to understand women's changing priorities, the problems women face and the effects this may have on men

	I am unable to impact	I have	I will		
c.				c.	...arrange(d) discussion groups and speakers to help them understand the socialization pressures on males
d.				d.	...remind(ed) them about cooking and child-rearing courses when arranging their schedules
e.				e.	...schedule(d) discussion groups about mutual problems which arise among males in conforming to the male-role stereotype established in our society
f.				f.	...invite(d) males who are engaged in non-traditional occupations to talk with male students about career choices
g.				g.	...provide(d) realistic information about their probable futures (i.e., many may expect to share household/family responsibilities in addition to providing financial support)
					Professional
a.				a.	...assist(ed) in scheduling information sessions and suggesting specific activities to reduce sexism
b.				b.	...assist(ed) in scheduling informational sessions and suggesting specific activities to understand the combined effects of sexism and racism
c.				c.	...sign(ed) up for the mailing lists of companies and groups developing nonsexist and nonracist work-awareness and testing materials
d.				d.	...order(ed) materials from such lists
e.				e.	...discontinue(d) use of vocational preference tests with separate forms or marking keys for females/males
f.				f.	...write(written) publishers of standardized tests about the sex and race biases in the content of test items
g.				g.	...encourage(d) an institution-wide review of counseling/educational materials which might reinforce bias and stereotyping
h.				h.	...participate(d) in in-service education relative to eliminating sex bias/stereotyping
i.				i.	...encourage(d) assertiveness training for females and males
j.				j.	...encourage(d) expressiveness training for females and males

	I am unable to impact	I have	I will
k.			
l.			
m.			

k. ...actively recruit and hire women into administrative positions.

l. ...actively recruit, hire nontraditional instructors.

m. ...promote, support and utilize research and development efforts on women in vocational education.

ADMINISTRATIVE INSTITUTIONAL ASSESSMENT FOR SEX EQUITY IN VOCATIONAL EDUCATION

Listed below are activities which relate to administrators' responsibilities for ensuring non-discrimination and sex equity in vocational education. The far left point of the scale (1) (2) indicates that little or no action has been taken; the mid-point of the scales (3) (4) identified action steps which have been taken to ensure implementation of the Title IX requirement for nondiscrimination; the far right point of the scale (5) indicates some of the measures which have been taken to overcome sex discrimination, sex bias, and sex stereotyping in compliance with Title II.

The assessment is based on a five-point scale. Read each scale, then determine the point which you think best describes the efforts undertaken in your agency/program and circle the appropriate number.

ACTIVITIES

A.	1 No Action taken in this area	2	3 Issued a policy directive on the implications of Title IX and requirements for nondiscrimination for vocational education to all appropriate staff?	4	5 Issued a policy directive on the implications of Title II of the 1976 Education Amendments and the need to overcome bias and stereotyping to all appropriate staff and encouraged them to submit ideas for program development?
B.	1 No action taken in this area	2	3 Reviewed policies governing access to vocational education courses and made modifications as necessary to ensure that they do not discriminate on the basis of sex?	4	5 Developed specific policies and programmatic guidelines for implementation of these policies to ensure sex equity in access to vocational education courses?

C.	1 No action taken in this area	2	3 Asked staff to submit information on instances of sex discrimination in vocational education policies, practices, and materials?	4	5 Asked staff, students and parents to submit information on instances of sex discrimination, sex bias, and sex stereotyping in vocational education policies, practices, and materials and suggestions for their elimination?
D.	1 No action taken in this area	2	3 Mandated compliance with Title IX provisions related to vocational education courses/programs through administrative directive?	4	5 Held mandatory inservice training for all vocational education staff on procedures for increasing sex equity in vocational education?
E.	1 No action taken in this area	2	3 Reviewed all descriptive materials related to student access to courses and modified them as necessary to ensure that they do not imply, either in text or in pictures, differential treatment of students on the basis of sex?	4	5 Developed and implemented special recruiting procedures and materials designed to attract and interest students in enrolling in vocational training nontraditional to their sex?
F	1 No action taken in this area	2	3 Examined procedures, criteria and testing instruments used in admitting or assigning students to vocational training and modified them as necessary to ensure that they do not discriminate on the basis of sex?	4	5 Notified parents and students of the procedures, criteria, and testing instruments used and the ways that they ensure equal access to courses on the basis of sex? Made available special educational services to students to assist them in meeting these criteria?

	1	2	3	4	5
G	No action taken in this area		Identified all vocational education courses/programs with enrollments of 80 percent or more one sex and made sure that any such disproportionate enrollments are not caused by sex discrimination in counseling services?		Identified all courses/programs with enrollments of 65 percent or more one sex and developed and implemented action plans for reducing those discrepancies in the numbers of males and females enrolled?
H	No action taken in this area		Reviewed all vocational education courses and curriculum outlines and modified them as necessary to ensure nondiscrimination on the basis of sex?		Made curricular and programmatic changes, including provision of support services, which will ensure females and males entering and completing courses/programs nontraditional to their sex?

If your total equity score falls below 3, you may need to undertake the kinds of procedures suggested in the middle column to ensure that your program is in compliance with Title IX. If your score is above 3, it indicates that you have made efforts to overcome sex bias and stereotyping.

Total equity score: ________
(Compute total for all scales and divide by 8.)

A similar scale may be structured to assess your staffing.

Adapted from
Vocational Education Sex Equity Strategies
NIE Project Workwhop April 1978

SBDL 48 pm

HOW TO ANALYZE THE FAIRNESS OF FACULTY WOMEN'S SALARIES ON YOUR OWN CAMPUS

Barbara R. Bergmann and Myles Maxfield, Jr.

At the College Park campus of the University of Maryland, a comparative study of salaries of men and women faculty members was recently undertaken under the aegis of Committee W of our campus AAUP chapter. The purpose was twofold: to find out in broad terms what the situation of women faculty members is on the College Park campus, and to try to develop a prototype of a study which could be done fairly easily by a faculty group on any campus where the salary information was available.

By now, research on the salaries of men and women faculty members has been done on a considerable number of college and university campuses.[1] On each of the campuses for which reports have thus far been published or circulated, research results have indicated that women faculty members are, on average, paid less than comparable male faculty members. Individual faculty members on any campus differ, of course, in experience, degree, field of specialty, publications and teaching skill, and these differences do affect salaries paid to those individuals. However, all of the published studies have shown that after the effects of these characteristics have been taken into account there still remain unexplained differentials in salary between men and women on campus after campus. These differentials point strongly to the operation of systematic practices which tend to reduce the salary of a woman faculty member below what she would be getting were she a man with similar characteristics.

Since the practice of paying faculty women less than comparable faculty men seems to be so widespread, information is needed on each campus to delineate the situation on that campus and to provide a basis for ameliorative action, if any is needed. Such an analysis should be diagnostic: it should indicate whether there is a problem of sex discrimination on campus; it should aid in directing attention toward the most egregious individual cases and departments; and it should provide a rough estimate of the amounts of money which might be needed to bring women's salaries on campus up to the level of comparable men's salaries.

Having done the study at Maryland, we now believe that carrying through a study of the type described below is within the abilities of faculty groups on many campuses and that the Maryland study could serve as a model for groups on other campuses. The major ingredients in a study of this type are raw data on individual salaries and on some of the characteristics of individual faculty members which might legitimately explain salary differences. Some computer analysis of the data is also necessary.

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[1] B. B. Beagan and B. J. Maynard, "Sex Discrimination in Universities: An Approach Through Internal Labor Market Analysis," AAUP Bulletin, 60 (Spring, 1974), pp. 3-21; D. A. Katz, "Faculty Salaries, Promotions, and Productivity at a Large University," American Economic Review, 63(1973), pp. 469-477; M. G. Darland, S. M. Dawkins, J. L. Lovasich, E. L. Scott, M. E. Sherman, and J. L. Whipple, "Application of Multivariate Regression to Studies of Salary Differences between Men and Women Faculty," Proceedings of the American Statistical Association, 1973, Social Statistics Section, pp. 120-130.

We next ran a "multiple regression" computation, using as input to the computation only the data for male faculty members. The computation produced a way of "predicting" a male faculty member's salary based on information about that faculty member. Our regression equation for Maryland male faculty members came out as follows:

"Predicted Salary" equals $15,237 plus $447 for each "year since degree" minus $3,685 if person lacks a doctorate plus a departmental differential.

The departmental differential was the number of dollars per year since degree which should be added or subtracted for membership in a particular department. For example, our computation indicated that for Maryland male faculty thirty-one dollars should be added for physicists and eighteen dollars subtracted for economists for each year since last degree. This regression equation is not designed to predict with any exactitude any individual's salary (the standard error of the prediction for men was 3,352 dollars, and the equation "explained" only 52 percent of the variance in men's salaries), but rather to show what the average situation was for men of a given number of years of experience in a particular department. It should particularly be noted that no measures were included in the computation which had bearing on scholarly merit or teaching performance. Therefore some of the differences between a faculty member's actual salary and the one which would be predicted for him by the regression equation may be due to the fact that a faculty member was above or below average in these characteristics. Of the 1049 male faculty members included in the computation, 587, or 56 percent had actual salaries which were below the salaries predicted for them by the regression equation and 462 had salaries which were above their predicted salaries. In terms of dollars, the sum of the overpredictions for men was constrained by the methodology to be equal to the sum of the underpredictions.

TABLE 1

Summary Results of University of Maryland Salary Study, Academic Year 1974-75, College Park Campus

	Total number of persons	Number of persons, "predicted" salary greater than actual salary	Sum of "predicted" salaries less sum of actual salaries
Women	166	122	$275,604
Men	1,049	587	1

HOW THE MARYLAND STUDY WAS DONE

Since the University of Maryland is a state institution, the line-by-line budget document with names of faculty members is, by state law, public information. It would have been desirable to use information from a magnetic tape the University had made which would give the same information as the budget document and this would have saved our committee the work of manually copying the information. However, the University administration chose not to make the information on the tape available to us in the form we needed in a timely way, so we were forced to resort to the printed budget document, which was easily available thanks to the investigative reporting of the Diamondback, our student newspaper.

Our first step was to mark in the document with a check mark those faculty members who were women. Every case of ambiguous name or initials was checked by a telephone call to the person's department office. We next wrote in on the budget document some information which we found about each faculty member in the University catalogue: whether the faculty member had a doctorate, and the date of his or her last degree, which served as a measure of the number of years of professional experience. Each department was assigned an identification number (1 through 84, in the case of Maryland), and that number was written in on the budget document.[2]

The next step was to prepare "coding sheets" from the information in the budget document which we wished to include in our analysis. Each faculty member was given a line on the coding sheet on which was recorded his or her department number, sex (0 for man, 1 for a woman), salary, whether the person was on a ten- or twelve-month), percentage of time for part-timers (0 for full-timers), whether the person had a doctorate or not (0 for yes, 1 for no), and the year of last degree (two digits). For women, the names were put on the coding sheet; to save time this was not done for men, for whom the space was left blank. Each item was recorded in a particular set of columns, chosen in advance. (See sample coding sheet in Figure 1.)

We next had the information on the coding sheets punched onto computer cards, one for each faculty member. We now were ready for our computer analysis. The computer separated the women from the men (this could have been done by keeping separate coding sheets for the men and the women, but we chose to let the computer do it). For each faculty member, we computed that person's salary in terms of a ten-month full-time equivalent. We computed "number of years since degree" by subtracting year of degree from seventy-four. Finally, we put the information on department into slightly different form.[3]

---

[2] Departments with no male members must be excluded. Women in such deparments may be "assigned" to the most comparable department for the purposes of the study.

[3] We constructed eighty-three "dummy variables" (one less than the number of departments), which would help us to gauge the effect of being in a particular department on that person's salary. For example, a person in the eighth department had the eighth "dummy variable" set equal to his "years since degree"; all other dummy variables for that person were given the value zero. For members of the eighty-fourth department, which happened to be psychology, all of the dummy variables were set equal to zero.

Our next step was to use the regression equation to predict the salaries of faculty women. For each woman, her years since last degree, whether or not she had a doctorate, and her department were inserted into the regression equation, and the salary which would have been predicted for her had she been a man with those characteristics was computed. A computer printout was produced which gave for each woman faculty member her name, her predicted salary, and her actual salary.

The overall result pointed very strongly to the presumption that the salary-setting procedures at the College Park campus had produced results which were sex biased. Of the 166 women at Maryland, 122 of them, or 73 percent, had actual salaries lower than those which would have been predicted for them had they been men, and 44, or 27 percent, had salaries higher than those predicted. In terms of dollars, the sum of predicted salaries exceeds the sum of actual salaries by $275,604. A number of women faculty members whose actual Maryland salaries were considerably less than the salary predicted for them were scholars of national or even international reputation. At this writing, the College Park Committee W is in the process of consultation concerning appropriate means of correcting the very serious situation shown by its salary study.

The material we got out of the budget was also useful in studying the representation of women by rank and by department. We were able to use tabulations made from the data to pinpoint three departments which had few or no women faculty members, yet which were in fields where women were quite plentiful. We were also able to use the computerized list of names of women faculty members as a means of communication and organization; for a few seconds of computer time and a modest amount of programming skill, the computer typed out and addressed "letters" informing women faculty members of the survey, its results, and of the meetings of Committee W.

DOING A STUDY ON YOUR OWN CAMPUS

The major task involved in doing a study of men's and women's salaries is the gathering of the data. Even in public institutions, obtaining the necessary salary data on a person-by-person basis is not necessarily easy, although in virtually all cases it should be possible. For private institutions, the active cooperation of the institution's administration is certainly desirable. An administration may be willing to give salary information for individuals if the names are withheld. Although less satisfactory, the information in this form is better than nothing, especially if information about each individual such as sex, age, rank, year of degree, department, and the like are also included in the package. If the salary data cannot be obtained from administration documents, then resort to a questionnaire to faculty members might be tried.

In the computation for Maryland, the "year of degree" was used as an indicator of the number of years the individual had been in professional life. If this type of information is not available, some substitute may be used, such as age. Rank is also something of a substitute for "years of professional life," but a highly imperfect one, since women may be discriminated against by failure to promote as well as failure to pay fairly. If rank is used in the calculation, the amount of discrimination diagnosed will be artificially lowered for this reason. The number of years with the institution is not a substitute for years of professional life.

Interpreting the study must also be done with considerable care. As noted above, the computation is designed to give a broad-brush picture of the status of faculty women as compared with faculty men. For a particular individual, an actual salary which is lower than the predicted salary may be due, at least in part, to sub-par performance in scholarship or teaching. The mathematical form of the equation may also be ill-suited to predict the salaries of certain faculty groups[4] However, when the calculation shows that a very high proportion of the women are in the position of having actual salaries lower than predicted as is the case at Maryland, the presumption that salary-setting procedures are producing results which are fair to women must be abandoned and action taken to raise the salaries of women whose situation upon closer individual examination is seen to be unfair. In the examination of individual cases, one technique which has been found to be useful is the identification for each woman of male "peers," whose standing and contribution are roughly the equivalent of that woman. A male "peer" might be nominated by the woman herself and by the chairperson of her department, and the salary of both nominees compared with hers.[5] This procedure could usefully supplement, or for individual cases replace entirely, the use of the predictive equation; the latter is an easier way to get a diagnosis for the campus as a whole.

4.The equation computed for Maryland was based on an intercept ("base salary") common to all departments and a slope (increase in pay for each year of professional life) which varied by department. This seemed to give slightly better predictions on average than an equation in which the intercept varied by department but the slope was common to all departments. Other forms of the equation are also possible. The point is, however, that any form chosen is at best a compromise, and in going from one form to another the prediction will be improved for some male faculty members at the expense of goodness of prediction for others.

5See Darland et al., cited above.

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SEX EQUITY
CHECKLIST FOR COUNSELORS AND OTHER PUPIL PERSONNEL WORKERS

		Yes	No
1.	Are basic readings on sex role stereotyping available to staff?	___	___
2.	Have I given special help to girls and young women by:		
	a. encouraging them in a wide range of job choices, including traditional male occupations?	___	___
	b. motivating girls toward leadership positions and job goals that lead to the highest levels of responsibility?	___	___
	c. providing detailed assistance with scholarship and loan applications and opportunities?	___	___
	d. assuring an equal distribution of scholarships among females and males?	___	___
	e. making an all-out effort to understand barriers that young women raise for themselves in response to socialization pressures?	___	___
	f. scheduling discussion groups for girls about mutual problems, future alternatives?	___	___
	g. subscribing to some of the newer publications for women (e.g. The Spokeswoman, or Women Studies Newsletter)?	___	___
	h. asking interesting and knowledgeable women in the community to talk with large and small groups.	___	___
	i. publicizing opportunities available to girls?	___	___
	j. giving girls realistic information about their probable job futures (i.e. most of them can expect to hold paying jobs even if they marry)?	___ ___	___ ___
	k. reminding girls about physical education and shop courses when arranging their schedules?	___	___
	l. informing pregnant girls about the options they have for continuing in school?	___	___
3.	Have I given special help to boys and young men by:		
	a. encouraging them in a wide range of job options, including traditional female occupations?	___	___
	b. helping them to understand women's changing priorities, the problems women face, and the effects this may have on men?	___	___
	c. arranging discussion groups and speakers to help them understand the socialization pressures on males?	___	___
	d. counselling a young man who has participated in getting a young woman pregnant?	___	___
	e. reminding them about cooking and child-rearing courses when arranging their schedules?	___	___

4. Have I acted as consultant to the faculty by:

    a. scheduling informational sessions and suggesting specific activities to reduce sexism? ___ ___

    b. scheduling informational sessions and suggesting specific activities to understand the combined effects of sexism and racism? ___ ___

5. Concerning the materials I use,

    a. am I on the mailing list of companies and groups developing nonsexist and nonracist work-awareness and testing materials? ___ ___
    b. have I been ordering materials from such lists? ___ ___
    c. have I discontinued use of vocational preference tests with separate forms or marking keys for female/males? ___ ___
    d. have I written publishers of standardized tests about the sex and race biases in the content of test items? ___ ___
    e. am I encouraging a district-wide review of counseling materials which might reinforce bias and stereotyping? ___ ___

6. Has my training and inservice education provided me with up-to-date information on sexuality (including lesbianism and homosexuality)? ___ ___

7. Have I been trying to develop closer school contact with fathers as well as with mothers? ___ ___
8. Have I provided assertiveness training for girls and for boys? ___ ___

9. Have I provided expressiveness training for girls and for boys? ___ ___

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SEX EQUITY
QUESTIONNAIRE REGARDING STUDENTS

		YES	NO
1.	In your school are females expected to act "like girls/women" and males "like boys/men"? Are females being prepared for roles as traditional women? Males as traditional men?	___	___
2.	Do females tend to take certain courses and males other courses? Does a female in an automechanics course get hassled by other students? If a male takes a sewing course, is he ridiculed?	___	___
3.	Do teachers and counselors inform both females and males of a wide range of work possibilities? Or are females and males channeled into traditional vocational courses and traditional job plans? Do teachers and counselors point out that traditional "women's jobs" pay less than traditional "men's jobs"?	___	___
4.	Do teachers ask females to help with "housewifely chores" such as watering the plants and dusting, and males to help with "manly" chores such as carrying boxes and operating the movie projector?	___	___
5.	Are females and males encouraged to participate in a wide variety of clubs? Or do females cluster in some clubs and males in others? Do females and males equally serve as president? Are females expected to be secretary?	___	___
6.	Are females, particularly at the high school level, expected to be "dumb," and are they reluctant to reveal their intelligence?	___	___
7.	Are females, particularly at the high school level, expected to be "helpless" or incompetent? Are they reluctant to reveal their skills and strengths?	___	___
8.	Are males ridiculed for being "weak," "emotional," "caring," "artistic," "sensitive"?	___	___
9.	Are females of ethnic minority groups expected to behave differently from white females? From males of their minority group?	___	___
10.	How are women portrayed in the books you use? Is Women Studies taught?	___	___
11.	Are females called "chicks," "broads"? Are males referred to as "jocks"? Do students think these terms are derogatory or complimentary?	___	___
12.	Is sex stereotyping, bias, and discrimination being eliminated in your school?	___	___
13.	Is there a student committee to identify and make recommentations to remediate sex stereotyping, bias and discrimination?	___	___
14.	What are your student enrollments by sex--institutionally and by programs? Do they approximate the ratios of males/females in Colorado or the community served?	___	___

SEX EQUITY
QUESTIONNAIRE REGARDING EXTRA CURRICULAR ACTIVITIES

		YES	NO
1.	Does your school have sex-separated clubs, activities, and/or assemblies?		
2.	What is the composition (female/male ratio) of most clubs/activities in your school?		
3.	Are there any coed clubs/activities which no females have joined? Males?		
4.	Are there any clubs/activities equally divided by sex?		
5.	What is the basis for selection to participate in school activities such as cheerleaders, stagehands, audio-visual aids, hall monitors, office helpers, etc.?		
6.	Is funding equitable for a wide variety of activities?		
7.	Are certain activities which receive more funding limited to one sex?		
8.	Do males and females of all ethnic groups have an equal opportunity to participate in service and social projects?		
9.	Does your high school send home notices announcing activities of public or private organizations for one sex only (such as the "Y's", the Recreation Department, Little League, Babe Ruth, etc.)?		
10.	Do any of these sex segregated organizations use your school facilities free?		
11.	Who holds student government and class offices in your school? (# of females/males; non-minority/minority).		
12.	Are some offices traditionally or officially reserved for females or males?		
13.	How do parents participate in school activities? (PTA, PTSA, room parents, chaperones, etc.)		

SEX EQUITY
CHECKLIST FOR ANALYZING A SCHOOL LIBRARY/LEARNING RESOURCE CENTER

		YES	NO
1.	Books and/or library sections are not designated as *for females* or *for males*.	___	___
2.	The library includes materials which discuss psychology, sociology, economics, political science, and history from feminist viewpoints.	___	___
3.	The library includes a significant number of biographies and autobiographies about and by women from a variety of racial and cultural groups.	___	___
4.	The library includes materials which portray women favorably in roles other than wife, mother, homemaker, nurse, teacher, and other traditional female occupations.	___	___
5.	The library includes materials which portray men favorably in roles which include husband, father, homemaker, nursery school teacher, nurse, and other nontraditional occupations.	___	___
6.	Library displays include feminist subjects and multi-ethnic concerns.	___	___
7.	Library displays depict culturally and ethnically diverse women and men in a wide variety of activities, including childcare, housework, and jobs which have tended to be viewed as "men's work" or "women's work".	___	___
8.	The library subscribes to and makes readily available feminist periodicals and publications.	___	___
9.	The library subscribes to and makes available periodicals and publications about sex stereotyping of men and boys.	___	___
10.	Materials on job choices offer a wide variety of options for both females and males. They do not suggest that certain jobs are *for females* and others *for males*.	___	___
11.	Procedures and criteria for selecting library materials include evaluation for sexism and racism.	___	___
12.	A brief examination of selected items in the library shows that they meet the standards of nonsexist and nonracist instructional materials.	___	___
13.	Publishers guidelines for eliminating sexism have been distributed to all staff.	___	___
14.	A committee has been trained and reviews all publications for sex bias, stereotyping and sex discrimination.	___	___
15.	Publishers are notified of sexism findings, with requests to correct prior to reprinting.	___	___

QUESTIONNAIRE REGARDING EDUCATIONAL MATERIALS

YES NO

1. Are women and men from diverse cultural and ethnic backgrounds portrayed in a wide range of roles, including nontraditional ones? (Are women present as authors in literature anthologies; as scientists in science books; as leaders, reformers, pioneers, etc. in history books; as managers in business education books; and as machinists, farmers, heroes, and mayors? Are men present as homemakers, secretaries, elementary school teachers, telephone operators, clerks, and fathers?) ___ ___
2. How well integrated into texts are the comments on women? Are the comments bunched into a separate "women's page", chapter, or paragraph? Are women of different race, religious, and ethnic groups included? ___ ___
3. Does the author make generalizations about "man"? Does "man" mean "human" or "male"? If it means "Human" are the activities, characteristics, etc. described or pictured common to both sexes? If it means "Males" is equal coverage given to "woman"? (The "generic" usage of "Man" and "mankind" should be replaced by "Human", "humankind", and "people" since "man" and "mankind" are ambiguous, and worse, it makes many girls and women feel excluded and dehumanized.) ___ ___
4. Count the pictures of people in materials. Are females half of the total? Do women, men, girls, and boys represent diverse racial, religious, ethnic, and class backgrounds? In pictures which illustrate both females and males, are females independently significant, or are they appendages to male characters? ___ ___
5. Does content focus as often on females as on males? Does the material portray females and males of diverse racial, religious, and ethnic groups, with their similiarities and differences in such a way as to build positive images? ___ ___
6. How much emphasis is given to traditional "female" values, such as compassion, consideration, tenderness, as opposed to traditional "male" values such as assertiveness, risk-taking, and strength? Are these values offered as ideals for both sexes? ___ ___
7. Are males shown reading, admired for their school achievement? Or do the pictures or story suggest that males are too active and mischievous to be successful in school? ___ ___
8. Does the story line show subtle bias? For example, do males (especially white males) have the power and make decisions? Do females of minority groups function in subservient positions? ___ ___
9. Are the achievements of girls and women based on their own initiative and intelligence, or is their success due to their good looks or to their relationships with males? Would the story be essentially the same if the gener, or ethnic group, of the characters were reversed? If not, is there stereotyping that suggests a negative image of females? Males? People of particular ethnic groups? ___ ___
10. When males and females have different viewpoints, are the females' behaviors looked upon as "problems" to be "solved"? Are females expected to "act like males" in order to be accepted as their comrades or as equals? Are sensitive males labeled "sissies"? ___ ___

11. Does the material assist students to clearly recognize and to accept basic similarities among all members of the human race, and the uniqueness and worth of every individual, regardless of sex, race, religion, age, or class background? ___ ___

12. Does the material present a significant number of instances of fully integrated human groupings (sex, age, race, class) and settings to indicate equal status and non-segregated social relationships? ___ ___

13. Are quotations, references, and extra reading recommendations authored by women as well as by men? How many of the authors are ethnic minorities? ___ ___

14. Are examples of women and men used equally to illustrate theories and ideas? In examples or illustrations, are females shown in passive behavior and males in more active situations as heroes, authors, researchers, doers and accomplishers? Do women have names, or are they known as "Mother", or as "________'s wife"? ___ ___

15. Does the material show awareness of a variety of people? Is more than one minority group shown? Are women of several physical types portrayed? Or are the women all young, pretty, slim? ___ ___

16. Does the material acknowledge the validity of a variety of lifestyles? Are adults who have chosen not to marry or have children portrayed favorably? When families are portrayed, do family relationships show individuals subordinated to one another because of sex? Are first-born children females as often as males? Are children and adults portrayed in single-parent families and in extended families (grandparents and other relatives, divorced and remarried parents, more than one family living together?) Does the portrayal emphasize the positive aspects of such family arrangements rather than suggesting that such arrangements are necessarily damaging to children? ___ ___

17. Are terms such as "the weaker sex" and "the little woman" etc. used? Are women referred to as "wives" as often as men are referred to as "husbands"? ___ ___

18. Does personification of inanimate objects and animals involve the female with sex stereotypes? ___ ___

19. Are there stories, reading selections, activities, and study units which discuss and criticize sex and race stereotyping? ___ ___

SEX EQUITY
QUESTIONS FOR PARENTS

Awareness	Yes	No
1. I discuss with my children sex-bias, its causes and possible effects.	___	___
2. I am aware of research which indicates that children who are least sex-stereotyped are also among the most creative and intelligent.	___	___
3. I seek out current literature on women's rights sex discrimination, and sexism in education.	___	___
4. I provide my children with supplemental reading material to enrich their learning about women's contributions and struggles across different ethnic and class backgrounds within American Society.	___	___
5. I assist my children in examining their texts for sexism and other biases (racism, classism, ageism, etc.)	___	___
6. I explain to my daughter that she should realize that at least 25 years of her adult life will not be filled with childbearing and childrearing (and longer if she chooses not to have children).	___	___
7. I encourage my daughter to consider a wide range of occupations which are not roles imposed by others but are a reflection of her abilities and interests.	___	___
8. I encourage my son to consider a wide range of job possibilities, including those traditionally ignored by males such as nursing and teaching young children.	___	___
9. I explain to my son that if he plans to be a parent, he must recognize that his work outside the home may be interrupted while he assumes equal responsibility for childcare.	___	___
10. Are parents involved in identifying and recommending steps to eliminate sex stereotyping, bias, and discrimination in vocational education?	___	___

In my home

1. I am careful not to organize activities along "this is for boys, this is for girls" lines. ___ ___

2. I avoid dividing chores by sex (e.g. boys mow lawns, girls dust furniture). ___ ___

3. I give my son a doll and encourage him to be nurturant and loving. ___ ___

4. I give my daughter a soccer ball and encourage her to be physically active ___ ___

5. I do not expect my daughter to be any more "mannered" in the conventional sense than my son. I teach them both a respect for the humanness of others. ___ ___

6. I tend to curb my socialization which says to discipline my daughter leniently and verbally, and my son strictly and physically. ___ ___

7. I am working to tolerate the same degree of independence, assertiveness, loudness, and restlessness from my daughter as from my son; and dependence, expression of fear, tenderness, and giggling from my son as from my daughter. ___ ___

8. I try to respond honestly to my children's questions about sexuality, and give information to my son and daughter about abortion, contraception, heterosexuality, homosexuality, lesbianism, family planning, and veneral disease. ___ ___

9. I do not tolerate more slang and rough language from my son than from my daughter. ___ ___

10. I have broken my habit of thinking of and referring to only girls as "sweet, helpful, gentle, neat, passive, dainty, emotional, and weak"; I have given up thinking of and referring to boys as "strong, aggressive, active, bad, athletic, creative, intellectual, and brave." ___ ___

11. I challenge demeaning comments made by one sex about the other, such as "I don't want to play a dumb girl's game," "She's only a dumb girl," "He's all brawn and no brain." ___ ___

12. I do not refer to the father as the "head of the family". ____ ____

Concerning my child's schooling

1. I support equally my daughter's and son's involvement in extra-curricular activities, and I pay special attention to the development of new coeducational sports programs as well as additional athletic activities for girls. ____ ____
2. I have conferred with my child's teachers about my concern over the damaging effects of sex and race stereotyping. ____ ____
3. I share with my child's other parent (when possible) responsibility for PTA, PTSA, school volunteering, cookie baking, etc. ____ ____
4. I encourage the school library (and the public library) to add materials and books from presses publishing items about nonstereotyped females and males (e.g. The Feminist Press, Daughters, Inc., Lollipop Power, New Seed Press). ____ ____
5. I have encouraged the PTA or other parent groups to schedule a program on sexism in education at one of their meetings. ____ ____
6. I have familiarized myself with Title IX regulations (available from H.E.W.) and state laws (available from state departments of education) which prohibit discrimination on the basis of sex in education. ____ ____
7. I have helped to organize a group of concerned community people to assist the school district in identifying and eliminating sex and race discrimination. ____ ____
8. I have helped to outline to members of the School Board the damaging effects of sex and race discrimination, and my concern that it be eliminated. ____ ____

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DEVELOPING
STAFF/STUDENT
RECRUITMENT
PLANS

VIII

BRIDGE, May 1978

Published by West Virginia Department of Education, Bureau of Vocational, Technical and Adult Education.

IDEAS FOR RECRUITING NONTRADITIONAL STUDENTS

Marlene Grady, new specialist for the elimination of sex bias in the State Department, offers the following ideas for recruiting females and males into programs not normally associated with their sex. Some of the ideas are related to recruitment in general as well.

1. Sponsor an inservice for feeder school guidance counselors and administrators and introduce them to programs available.
2. Have teachers at the local vocational school rotate through each instructional area and receive actual classroom instruction.
3. Allow prospective students to spend time in various vocational areas prior to attending the vocational center.
4. Allow students at the area vocational school to switch classrooms and receive classroom instruction in those areas.
5. Hold open houses for parents of potential students and students at area vocational schools. Allow students and parents to experience actual classroom instruction.
6. Hold mini assemblies on programs at the vocational center. Have past graduates give programs relating to their training and experiences.
7. Sponsor mini assemblies in which women or men from non-traditional vocational areas present programs.
8. Provide information to potential vocational students on earnings available to vocational graduates in various areas.
9. Advertise in local newspapers adult learning programs, state and picture that all programs are open to either sex.
10. Encourage guidance counselors to make students aware of prerequisites needed for further vocational plans.
11. Have fliers or pamphlets printed depicting both males and females in vocational areas to be distributed through the local high school or perhaps have a school organization such as VICA, DECA, FFA, FBLA, FHA/HERO use this part of their school project.
12. Sponsor monthly principal and guidance counselors session at the vocational school at which time these persons can visit various instructional areas so they may become more familiar with course curriculum.
13. Design new prevocational programs which would allow both males and females to explore various programs.

Programs can be found in Ritchie, Putnam, Berkley, Fayette, and to open in 1978 Taylor County.

HOW TO RECRUIT

Directions: The purpose of this activity is to brainstorm as many suggestions as possible as to how you, in your role of vocational administrator, can recruit and assure the successful completion of students or retention of staff in courses nontraditional to their sex. You'll use many of these ideas later as you develop a specific program to increase the numbers of females or males in certain courses or programs.

First, form role groups of instructors, administrators, or counselors. Next, appoint a recorder who will write an newsprint all the ideas generated by your group. When the facilitator gives the signal, suggest as many ideas as you can on how you could recruit more students or staff into courses nontraditional to their sex and how you can assure successful student completion or staff retention in such courses/programs.

Before she/he gives the "go" signal, the facilitator will review with you the following basic principles of brainstorming:

-- The purpose is to generate as many ideas as possible within a short amount of time.

-- There will be no evaluation of ideas. Although an idea may appear to be impractical or unworkable, that idea may stimulate someone else to contribute something which would be highly practical and workable.

You may want to use the rest of this sheet for jotting down some of the ideas which you have or some of those generated by the group which would be particularly relevant to you in your school.

After 10 minutes the workshop facilitator will call time. The recorder for each group should post the group's work where it can easily be seen. Each recorder will then summarize the ideas of the total group.

DEVELOPING A PLAN FOR RECRUITING STUDENTS INTO VOCATIONAL TRAINING PROGRAMS NONTRADITIONAL TO THEIR SEX

Worksheet

Directions: In this activity, you'll have the opportunity to develop a specific plan for recruiting students into courses/programs nontraditional to their sex and assuring their successful completion of such programs and courses. In developing this plan you'll be using data generated in the "How to Recruit" activity.

The following steps are involved in completing this activity:

- Form a group of three persons. Where possible, make sure your group includes persons from different professional roles--e.g., an administrator, a counselor, and an instructor.
- Review individually the following sections of this worksheet:
  - -- Background Information
  - -- Current Male/Female Enrollments
  - -- Sample Recruiting Plan
- Decide within your group the area on which your recruiting plan will focus. It may be a course (singles living), a program (carpentry), or an area (health occupations). You may also select two programs (floristry and ornamental horticulture, for example) if a grouping of two or more programs is basic to your recruitment plan. The area(s) you select may be those you are most familiar with, those that show the greatest discrepancies in male and female enrollments, or those chosen on the basis of other criteria that you establish.
- Feel free to make any assumptions about the courses/programs that you believe to be appropriate (e.g., that the curriculum has not been adapted to meet the interests and needs of both sexes).
- Using the attached form, develop a recruiting plan for enrolling and ensuring the successful completion by students of courses nontraditional to their sex. The ultimate goal will be to balance male/female enrollments in vocational education areas, courses, or programs so that students of both sexes are represented in proportion to their representation in the population served plus or minus 10 percentage points. As part of the plan, develop specific objectives and a timetable and work activities for achieving those objectives. Use a separate form for each course/ program area you select. Do as many as you can in the time allotted.

* Note: This plan can also be effectively used to recruit staff.

Sample Recruiting Plan Format

1. Goal: To effect measurable increases in vocational education areas, programs, or courses to the goal that students of both sexes are represented proportionate to community population ratios.

2. Program area(s) covered in this recruiting plan: ____________________

3. List up to three objectives leading to the achievement of the above goal for the selected program area(s). Indicate a timeline for the completion of each.

   Objective #1: ____________________

   Objective #2: ____________________

   Objective #3: ____________________

4. List up to three specific work activities for achieving objectives. Also, designate the person who has primary responsibility for the implementation of each activity (administrators, counselors, or instructors) and a timeline for completion of the task.

   Objective #1

   Work activity #1: ____________________

   Person(s) responsible: ____________________

   Completed by: ____________________

Work activity #2: ______________________________

Person(s) responsible: ________________________

Completed by: ________________________

Work activity #3: ______________________________

Person(s) responsible: ________________________

Completed by: ________________________

Objective #2

Work activity #1: ______________________________

Person(s) responsible: ________________________

Completed by: ________________________

Work activity #2: ______________________________

Person(s) responsible: ________________________

Completed by: ________________________

Work activity #3: ______________________________

Person(s) responsible: ________________________

Completed by: ________________________

SBDL 24 sa
(6/25/79)

RESOURCES

IX

STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Research on Sex Bias in the Schools

AGE AND SEX DIFFERENCES IN THE VOCATIONAL ASPIRATIONS OF ELEMENTARY SCHOOL CHILDREN. Lynn Stewart Hewitt. *Journal of Psychology*, Aug. 1975, 96(part 2): 173-178. ...Studied the vocational aspirations of 128 six- and eight-year-old Dutch boys and girls. The results suggest that sex role expectations for adult occupations are acquired very early and strongly circumscribe the range of vocations perceived as appropriate for females.

ARE YOUR SEX STEREOTYPES SHOWING? Andrew T. Nappi and Rose K. Reha. *Elementary School Journal*, Nov. 1975, 76(2): 70-74. ...Sex biases are present among elementary school pupils, according to results from a questionnaire designed to elicit sex-stereotyped job-role images of 197 elementary school students.

EFFECT OF SEX-LINKED VOCATIONAL INFORMATION ON REPORTED OCCUPATIONAL CHOICES OF HIGH SCHOOL JUNIORS. Robin Elaine Hurwitz and Mary Alice White. *Psychology of Women Quarterly*, Win. 1977, 2(2): 149-156. ...Information about new occupational opportunities for women was read by 144 high school juniors, while 106 other juniors read information about opportunities in general. All students subsequently selected occupations. Differences were found in the status of occupations chosen for boy versus girl profiles.

INTEREST IN AND STEREOTYPING OF THE SECRETARIAL POSITION FOR MALES. Hilda F. Alfred and Hope T. Hurd. *Vocational Guidance Quarterly*, Mar. 1978, 26(3): 255-259. ...High school students from various types of schools neither stereotyped nor chose to stereotype the secretarial position. Interested males should be encouraged to become secretaries.

MINIMIZING OCCUPATIONAL STEREOTYPES. Harry Vincenzi. *Vocational Guidance Quarterly*, Mar. 1977, 25(3): 265-268. ...This investigation of the effect of exposing sixth-grade children to people working in occupations that have not traditionally been performed by their sex indicates that attitudinal changes can occur when children are made aware of occupational stereotypes.

OCCUPATIONAL LEVEL AND HOLLAND'S THEORY FOR EMPLOYED MEN AND WOMEN. Arnold R. Spokane and W. Bruce Walsh. *Journal of Vocational Behavior*, Apr. 1978, 12(2): 145-153. ...Investigated occupational level differences among 84 men and women employed in Enterprising environments using the Vocational Preference Inventory (VPI) and the Self Directed Search (SDS). Findings showed high occupational level workers tend to be more differentiated and more masculine than low occupational level workers.

OCCUPATIONAL ROLES ARE SEX-TYPED BY SIX- TO TEN-YEAR-OLD CHILDREN. Ruth F. Scheresky. Psychology in the Schools, Apr. 1977, 14(2): 220-224. ...Explored differences in elementary school children's acceptance of occupational roles traditionally sex-typed by society. The degree of sex typing was high among all 270 subjects at all age levels tested.

OCCUPATIONAL STEREOTYPING. THE MANDATE-CONDITION-NEED. S. Theodore Woal. May 1976, 13p. (ED 130 015) ...This report reviews studies done on sex-role stereotyping in the schools; it suggests that occupational information and career awareness given to young people in schools is biased; it reports that sex-role stereotyping of occupations starts at an early age; and concludes that there is a crucial need to broaden the occupational knowledge of both teachers and students.

SEX BIAS IN THE SCHOOLS: THE RESEARCH EVIDENCE. Andrew Fishel and Janice Potther, eds. Rutherford, NJ: Fairleigh Dickinson Univ. Press, 1977, 571p. Avail. from: Fairleigh Dickinson Univ. Press., P.O. Box 421, Cranbury, NJ 08512. ...This collection of articles documents the blatant or unconscious sexism in primary, secondary, and higher education which discourages the intellectual, social, and vocational fulfillment of female students and teachers.

SEX-ROLE ATTITUDES AND THE CAREER CHOICES OF MALE AND FEMALE GRADUATE STUDENTS. Debbie Valentine, et al. Vocational Guidance Quarterly, Sept. 1975, 24(1): 48-53. ...Tests and finds some support for two hypotheses: (1) women choosing traditionally feminine occupations are more conservative concerning feminine roles than are women selecting traditionally masculine occupations and (2) men entering traditionally masculine occupations are more conservative in sex-role attitudes than are men entering traditionally feminine occupations.

SOCIAL CLASS AND SEX-STEREOTYPING OF OCCUPATIONS. Stan L. Albrecht. Journal of Vocational Behavior, Dec. 1976, 9(3): 321-327. ...Ascertains the degree to which occupational sex stereotyping is differentially found at different social class levels. Finds that education is strongly correlated with sex stereotyping of 15 different occupations, but income level is significantly related to such stereotyping in only 2 of the 15 cases.

UNDOING SEX STEREOTYPES: RESEARCH AND RESOURCES FOR EDUCATORS. Marcia Guttentag, et al. Washington: Capitol Publ., 1977, 342p. Avail. from: Capitol Publications, Suite G-12, 2430 Pennsylvania Ave. NW, Washington, DC 20037. $5.95. ...Contains an overview of the literature on sex-role differences, a description of three pilot intervention programs, and nonsexist curriculum for early childhood, the middle grades, and junior high school.

VOCATIONAL EDUCATION AND WOMEN. Pamela Ann Roby. Paper commissioned by COVERD, May 1975, 61p. (VT 103 359) ...Finds that despite the increased sums spent on vocational education in the last decade and national legislation affirming women's equal rights, women continue to be underrepresented in vocational education administration and in all vocational programs except home economics, nursing, and business. Reports that only a small percentage of research is currently being devoted to developing means of increasing vocational education's benefit to women; reviews related research; and offers suggestions for research and development projects.

VOCATIONAL ROLE CHOICE IN SECOND- AND SIXTH-GRADE CHILDREN. Gary Kriedberg, et al. Sex Roles, Apr. 1978, 4(2): 175-181. ...Interviewed male and female second- and sixth-graders. Found that, although goals associated with the women's liberation movement are not demonstrated clearly in the vocational aspirations or expectations of young children, they may be reflected in the aspirations of sixth grade females.

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Resource List

Research on Sex Bias in Counseling

THE CINDERELLA EFFECT: PLANNING AVOIDANCE IN GIRLS. Donald H. Blocher and Rita S. Rapoza. Counseling and Values, Oct. 1976, 21(1): 12-18. ...This study of 1,577 high school students in a large midwestern city explores differences between career planning for boys and girls. It shows the need to help girls plan clearly and consciously for a future in which education, work, and family responsibilities interact for their self-actualization.

DOES COUNSELOR RESPONSE TO OCCUPATIONAL CHOICE INDICATE SEX STEREOTYPING? Gary Price, et al. Paper presented at the Annual Meeting of the American Personnel and Guidance Association, 1977, 13 p. (ED 136 182). ...This research found no overt sex stereotyping in female and male counselors' perceptions of the appropriateness of occupational choices made by female and male students. There were significant differences between the female and male counselors, female and male occupational stereotypes, high and low status occupations, and high and low interests. It was determined that counselors view the interest level of the student as the most important variable in rating the appropriateness of the occupational choice.

DOES COUNSELOR RESPONSE TO OCCUPATIONAL CHOICE INDICATE SEX STEREOTYPING? Sherry B. Borgers, et al. Journal of the NAWDAC, Feb. 1977, 41(1): 17-20. ...This study found that high school counselors did not exhibit vocational female/male sex-role stereotyping of high school students in traditional occupational fields.

FEMALES AND SOCIAL OCCUPATIONS: FORCED OR FREE CHOICE. Gertrude Berger. School Counselor, Mar. 1978, 25(4): 250-253. ...This article suggests that many females select social occupations as a means of asylum from anxiety, which is caused by competing in male-dominated fields. The attempt to reconcile societal expectations of women as marriage partners with high achievement motivation denies her the full realization of her intellectual capabilities.

FOSTERING CAREER AWARENESS IN TENTH-GRADE GIRLS. Al Herman and Penny Robinson Woodcock. School Counselor, Mar. 1978, 25(4): 254-263. ...Describes a career development program that effected significant improvement in overall career awareness and in factual knowledge of the occupational status of women today, but did not effect significant changes in level of maturity of career choice attitudes, in self-appraisals competency, and in attitudes toward the rights and roles of women.

SEX DIFFERENCES IN THE CAREER DECISION-MAKING PROCESS. Lila Norris, et al. Princeton, NJ: Educational Testing Service, 1978, 182 p. Avail. from: College Boards Publication Order Department, Box 2815, Princeton, NJ 08541. Free. ...Analyzed career decision-making (CDM) behaviors of college students to see how variations in the CDM process are associated with age, sex, and sex-typed values. A major conclusion was that similarities between age and sex groups in the CDM process outweigh differences and justify sex-blind guidance.

SEX DISCRIMINATION IN GUIDANCE AND COUNSELING. REPORT. Vol. 1. Michele Harway, et al. Los Angeles: Higher Education Research Inst., 1976, 325 p. (ED 132 439) ...Reviews sex discrimination in vocational guidance and counseling at the secondary and postsecondary levels. The discussion is based on an extensive literature review, a re-analysis of existing data, and exploratory studies in the Los Angeles high schools.

SEX TYPING IN GIRL'S CAREER CHOICES: A CHALLENGE TO COUNSELORS. Sandra R. Harris. *Vocational Guidance Quarterly*, Dec. 1974, 23(2): 128-133. ...Study of the effectiveness of group counseling which is designed to increase the number of tentative career choices made by sixth-grade girls and to decrease the percentage of sex-typed choices.

A STUDY OF THE FACTORS INFLUENCING THE PARTICIPATION OF WOMEN IN NON-TRADITIONAL OCCUPATIONS IN POSTSECONDARY AREA VOCATIONAL TRAINING SCHOOLS. Vol. 1. Roslyn D. Kane, et al. Arlington, VA: Rj Associates, Inc., 1976, 189 p. (ED 132 429) ...Discusses the characteristics of women who choose nontraditional training programs, their problems, and counseling programs, and compares women in nontraditional, traditional, and mixed programs.

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(5/17/79)

STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Research on Sex Bias in Educational Materials

CAREER GUIDANCE MATERIALS: IMPLICATIONS FOR WOMEN'S CAREER DEVELOPMENT. Research and Development Series No. 97. Louise Vetter, et al. Columbus, OH: Center for Vocational Education, 1974, 90. (ED 106 542) Avail. from: National Center for Research in Vocational Education Publications, The Ohio State Univ., 1960 Kenny Rd., Columbus, OH 43210. $6. °°°Reports that sex-role stereotyping was found in almost all post-1970 high school level career guidance materials studied. Random samples taken from commerical and non-commercial lists, indicated that: 74% of illustrations of people of one sex were men; 74% of proper names used were male; 33% of men and 4% of women were pictured outdoors; 36% of the materials differentiated between male and female career patterns and 14% on pay scale; and 30% mentioned working mothers. Recommendations include: (1) honest discussions of occupational skills and life styles, (2) the use of the third person plural form of pronoun wherever possible, and (3) awareness of special statements on the subject.

DICK AND JANE AS VICTIMS: SEX STEROTYPING IN CHILDREN'S READERS: AN ANALYSIS. Princeton, NJ: Women on Words and Images, 1972, 78p. Avail. from: Women on Words and Images, Box 2163, Princeton, NJ 08540. $1.50. °°°Presents the findings of a group of 25 women who made a year-long study of 134 children's readers that were in use in the Princeton, NJ area.

GIRLS ARE FEMALES, BOYS ARE MALES: A CONTENT ANALYIS OF CAREER MATERIALS. Dale L. Gilsdorf and Lous T. Heshusius-Gilsdorf. Personnel and Guidance Journal, Dec. 1975, 54(4): 207-211. °°°This study examined two career orientation textbooks to determine the level of sexism in them, as measured by the Double Standard of Mental Health. The findings indicate tokenism in representing males and females equally in careers.

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Strategies to Achieve Sex Equity
Strategies for Counselors

CAREER COUNSELING FOR WOMEN: A WORKSHOP FORMAT. Donald J. Cochran and Penelope M. Warren. School Counselor, Nov. 1976, 24(2): 123-127. . . . Describes the life-planning workshop, a series of small group-learning exercises that examine sex-role conditioning; the exercises are life line, role identification, interests and past experiences, role stripping, typical and special days, and goal setting.

COUNSELING WOMEN FOR NONTRADITIONAL CAREERS. Walter S. Smith, et al. Ann Arbor, MI: ERIC Clearinghouse on Counseling and Personnel Services, 1977, 68p. (ED 150 533) Avail. from: ERIC/CAPS, 2108 School of Education Building, Univ. of Michigan, Ann Arbor, MI 48109. $4. . . . Presents an overview of women's employment, describes trends in women's career choices, and presents 5 hypotheses, with suggestions for accompanying activities, for counselors to use in counseling women for nontraditional careers. Provides an extensive resource list, divided into separate sections for readers who wish to explore further.

THE COUNSELOR'S WORKSHOP: SEX ROLE STEREOTYPING IN CAREER AWARENESS. Peter Kalunian, et al. Elementary School Guidance and Counseling, Dec. 1978, 3(2): 135-137. . . . Describes classroom activities that help rid elementary school students of stereotyped notions about male and female work roles. Involves role reconditioning, which sensitizes students to traditional sex-role stereotyping, and develops new attitudes about sex roles and the world of work.

EXPANDING VOCATIONAL HORIZONS: A TRAINING MANUAL FOR PRE-SERVICE COUNSELORS. Marianne H. Mitchell, Bloomington, IN: Indiana Univ., Dept. of Guidance and Counseling, 1978, 128p. Avail. from: Dept. of Guidance and Counseling, School of Education, 2805 E. 10th St., Bloomington, IN 47405. $5. . . . Readings, activities, and resources for training counselors in attitudes, awareness, and actions to eliminate sex stereotyping in vocational counseling.

EXPLORING NONCONVENTIONAL CAREERS FOR WOMEN. Jane Morris. School Counselor, Nov. 1975, 23(2): 127-131. . . . Describes a program involving group discussion, role playing, and other procedures that prompt senior high school girls to consider careers that are traditionally entered by males.

FACILITATING CAREER DEVELOPMENT FOR GIRLS AND WOMEN. Elaine House and Mildred Katzell, eds. Washington: American Personnel and Guidance Association, 1975, 112p. Avail. from: APGA, Publication Sales, 1607 New Hampshire Ave. NW, Washington, DC 20009. $4. . . . Report of the National Vocational Guidance Association Conference on guidance and women.

I CAN BE ANYTHING: CAREERS AND COLLEGES FOR YOUNG WOMEN. Joyce Slayton Mitchell. Princeton, NJ: College Board Publ., 1978, 315p. Avail. from: College Board Publication Orders, Box 2815, Princeton, NJ 08540. $7.95. . . . Gives specific information about which schools have most women in nontraditonal areas and outlines educational requirements for specific careers.

NEW CAREER OPTIONS FOR WOMEN. Thomas E. Backer and Helen S. Farmer. New York: Human Sciences Press, 1977, 3 vols. Avail. from: Human Sciences Press, 72 Fifth Ave., New York, NY 10011. $25.48/set. . . . This is a set of three volumes. A counselor's sourcebook (400p., $16.95) addresses counselors in educational institutions, public service agencies, and counselor educators; it lists resources, counseling strategies, and ways to change stereotyped attitudes. A woman's guide (96p., $4.95) summarizes major topics covered in the sourcebook and contains material for women returning to work; it can be used independently or as part of counseling. A selected annotated bibliography (128p., $9.95) contains 240 citations of books, journals, articles, and reports from economics, sociology, anthropology, and psychology pertaining to women and work.

SCHOOL COUNSELORS AND SEX BIAS IN CAREER PLANNING. Filson A. Young. School Guidance Worker, Dec. 1974, 30(2): 29-33. . . . Shows how crucial it is that counselors become aware of any conscious and unconscious biases which may influence their counseling behaviors.

SEX DISCRIMINATION IN CAREER COUNSELING AND EDUCATION. Helen S. Astin and Michele Harway. New York: Praeger, 1977, 154p. Avail. from: Praeger Publ., Div. of Holt, Rinehart and Winston/CBS, 383 Madison Ave., New York, NY 10017. $16.95. . . . Presents ways in which schools and counselors at all levels can take action to broaden the alternatives of students regardless of sex.

SEX DISCRIMINATION IN GUIDANCE AND COUNSELING. Washington: National Advisory Council on Women's Educational Programs, 1977, 10p. Avail. from: National Advisory Council on Women's Educational Programs, Suite 821, 1832 M St. NW, Washington, DC 20036. Free. . . . Reviews the report of the same name (see section A4) and presents actions recommended as a result of the report.

SEX FAIRNESS IN CAREER GUIDANCE: A LEARNING KIT. Linda B. Stebbins, et al. Cambridge, MA: Abt Associates, Inc., 1975, 265p. Avail. from: Abt Publications, 55 Wheeler St., Cambridge, MA 02138. $15. Plus $1.50 handling. . . . Presents self-administered curriculum materials which can be used by counselors and counselor educators to help eliminate sex-role stereotyping and sex bias in career choice. Organizes materials into parts: (1) orientation to sex fairness, (2) recommendations for a comprehensive sex-fair career program, (3) guidelines and recommendations for sex-fair use of career interest inventories, and (4) resource guide. Supplementary materials with the kit include 7 spirit masters, 8 role play cards, counselor-client interaction exercises, and a cassette tape of 4 counseling interviews.

VALUES, DECISIONS, CAREERS: A GROUP GUIDANCE PROGRAM FOR GIRLS. Frank O'Dell, et al. Paper presented at the Annual Convention of the American Personnel and Guidance Association, 1975, 15p. (ED 112 282) . . . This project used 10 one-hour sessions of group process techniques to meet the career development needs of girls and to deal with the limiting aspects of female stereotyping. The objectives were to give high school girls an opportunity to get to know themselves better, develop an understanding of the limitations of sex stereotyping, acquire better decision-making skills, and appreciate the need for career planning and information.

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Strategies to Achieve Sex Equity
Guidelines for Change

COMPLYING WITH TITLE IX: IMPLEMENTING INSTITUTIONAL SELF-EVALUATION. Shirley McCune and Martha Matthews. Washington: Resource Center on Sex Roles in Education, National Foundation for the Improvement of Education, 1976, 141 p. Avail. from: Supt. of Docs., U. S. Govt. Print. Off., Washington, DC 20402. Stock no. 017-080-01672-9. $2.10. ...Discusses the implications of Title IX, provides self-evaluation outlines and action checklists for specific educational programs, including vocational education and counseling, and gives guidelines for institutional evaluation.

A CONSUMER'S GUIDE TO SEX, RACE, AND CAREER BIAS IN PUBLIC SCHOOL TEXTBOOKS. Gwyneth E. Britton. Corvallis, OR: Britton and Associates, 1977, 229 p. Avail. from: Britton and Associates, Instructional Materials Analysis Services, 1054 NW Fillmore, Corvallis, OR 97330. $30. ...Reviews research on sex biased materials and provides an evaluation list as a tool to document the existence or absence of bias in curricular materials. 49 textbook series are evaluated in detail using the evaluation kit.

ELIMINATING SEX DISCRIMINATION IN SCHOOLS: A SOURCE BOOK. Raleigh, NC: Dept. of Public Instruction, Research and Information Center, 1975, 150 p. Avail. from: Dept. of Public Instruction, Research and Information Center, Raleigh, NC 27611. ...Sections on the importance of nonsexist language, sex bias in instructional materials, and sex bias in high school guidance and counseling.

EPIE CAREER EDUCATION SET*. VOLUME 1: HOW TO SELECT AND EVALUATE INSTRUCTIONAL MATERIALS. *(Selection and Evaluation Tools). New York: Educational Products Information Exchange Inst., 1975, 110 p. Avail. from: EPIE Institute, 463 West St., New York, NY 10014. $10. ...Provides schools with information needed for the evaluation and successful selection of instructional materials. Includes (1) a device by which teachers and administrators can pinpoint their schools' position on career education, (2) procedures for materials selection, (3) evidence of race and sex bias found in career education materials, (4) checklists for identifying bias in any materials, (5) methods for counteracting bias found in materials being used, and (6) how to assess producers' evaluation activities.

GUIDELINES FOR CREATING POSITIVE SEXUAL AND RACIAL IMAGES IN EDUCATIONAL MATERIALS. Nancy Roberts. New York: MacMillan and Co., 1975, 96 p. Avail. from: MacMillan and Co., 866 Third Avenue, New York, NY 10022. ...Specific guidelines for teachers' materials and texts in a variety of content areas.

GUIDELINES FOR ELIMINATING AND PREVENTING SEX DISCRIMINATION. Task Force to Study Sexism in the Schools, Michigan State Board of Education. Lansing, MI: Dept. of Education, 1976, 24 p. Avail. from: Dept. of Education, Office of School and Community Affairs, Box 30008, Lansing, MI 48909. Free. ...Lists itemized guidelines for 5 areas: (1) all levels of education agencies and their governing boards; (2) all levels of teachers and support staff; (3) elementary and secondary programs, activities, and curricula; (4) postsecondary programs, activities, and curricula; and (5) administrative procedures for the Dept. of Education.

GUIDELINES FOR EQUAL TREATMENT OF THE SEXES IN MCGRAW-HILL BOOK COMPANY PUBLICATIONS. New York: McGraw-Hill Book Co., 1974, 11 p. (ED 098 574) ...Intended primarily for use in writing and editing teaching materials, reference works, and general nonfiction, these guidelines were compiled to alert authors and editors to the problem of discrimination and to various solutions.

GUIDELINES FOR SEX-FAIR VOCATIONAL EDUCATION MATERIALS. Princeton, NJ: Women on Words and Images, 1978, 57 p. (ED 153 015) ...Presents guidelines for evaluating materials based on the following criteria: a 50-50 balance of males and females in materials, sex-neutral or sex-fair language, specific mention of issues involved in nontraditional career choices for males and females, and sex-fair occupational descriptions that accurately reflect performance requirements. Identifies issues, gives examples of sex-biased and sex-fair usage, and gives guidelines for sex-fair usage. Includes (1) a checklist for evaluating the sex bias of vocational education material and (2) guidelines and the creative use of biased materials in a non-biased way.

HUMAN AND ANTI-HUMAN VALUES IN CHILDREN'S BOOKS: A CONTENT RATING INSTRUMENT FOR EDUCATORS AND CONCERNED PARENTS. Racism and Sexism Resource Center for Educators. New York: Council on Interracial Books for Children, 1976, 280 p. Avail. from: CIBC Racism and Sexism Resource Center for Educators, 1841 Broadway, New York, NY 10023. $14.95 cloth, $7.95 paper. ...Gives a checklist for assessing children's books and critically reviews 235 books; gives completed values checklist for each.

SELF-STUDY GUIDE TO SEXISM IN SCHOOLS. Pennsylvanians for Women's Rights, Education Committee. Harrisburg, PA: Dept. of Education, 1977, 64 p. ...Includes guidelines on how to evaluate the curriculum, instructional materials, staffing, counseling, admissions, etc., in schools for sex biased content and procedures.

SEX EQUALITY IN EDUCATIONAL MATERIALS. Arlington, VA: American Association of School Administrators, 1975, 18 p. Avail. from: AASA, 1801 N. Moore St., Arlington, VA 22209. $2.50. ...Assessment techniques and guidelines for sex-fair language and usage.

SEX EQUALITY IN SCHOOL. Arlington, VA: American Association of School Administrators, 1975, 25 p. Avail. from: AASA, 1801 N. Moore St., Arlington, VA 22209. $2.50. ...Presents 5 categories of practices that limit as well as increase a student's options. Categories: (1) classrooms, (2) students' personal lives, (3) academic and vocational study, (4) extracurricular activities, and (5) physical education and athletics.

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Strategies to Achieve Sex Equity
Equity in Recruitment and Placement

COLLECTED PAPERS: WOMEN'S EDUCATIONAL ISSUES IN COMMUNITY COLLEGES. Washington State University, Fullman. Newton, MA: Education Development Center/Women's Educational Equity Act Program, 1978. Avail. from: EDC/WEEAP Distribution Center, 39 Chapel St., Newton, MA 02160. $1.50. ...These collected papers offer specific strategies for recruiting women for vocational training programs and helping them enter the nontraditional job market.

EQUAL VOCATIONAL EDUCATION. FINAL REPORT. Jane Lerner, et al. Houston, TX: Center for Human Resources, Univ. of Houston, 1976, 99 p. (ED 133 464) ...Describes a model program that was developed to recruit females into traditionally male-dominated vocational programs and to maintain the increased female enrollment. Materials developed for use in recruitment include a game, a slide/tape presentation (also available as a film), 3 case studies, data on women in the labor force, and a booklet on work life expectancy. The program was tested on 228 sophomore girls and evoked such positive response that presentations were made at 9 other high schools and 3 junior highs.

EQUAL VOCATIONAL EDUCATION MANUAL. Fredell Bergstrom and Joseph E. Champagne. Houston, TX: Center for Human Resources, Univ. of Houston, 1976, 65 p. Avail. from: Institute of Labor and Industrial Relations, Univ. of Houston, College of Business Administration, 4800 Calhoun, Houston, TX 77004. $7. ...Documents the procedures used in Project EVE to recruit students into nontraditional vocational education programs. Many of the activities are useful in mixed student groups.

LOCATING, RECRUITING, AND EMPLOYING WOMEN: AN EQUAL OPPORTUNITY APPROACH. Cecelia H. Foxley. Garrett Park, MD: Garrett Park Press, 1976, 357 p. Avail from: Garrett Park Press, Garrett Park, MD 20766. $7.50. ...Helps employers provide equal opportunities for women workers by describing education and training, laws, regulations, programs providing employment protection, and suggestions on ways of recruiting, employing, and working with women. Lists sources useful to employers in locating and recruiting women candidates for employment and offers suggestions for providing a climate conducive to their full professional and occupational development.

PLACING MINORITY WOMEN IN PROFESSIONAL JOBS. R & D MONOGRAPH 55. Robert W. Glover. Austin, TX: Center for the Study of Human Resources, Univ. of Texas, 1977, 77 p. (ED 149 135) Avail from: Supt. of Docs., U.S. Govt. Print. Off., Washington, DC 20402. Stock no. 029-000-00303-3. $2.40. ...Based on procedures used in the Minority Women Employment Program, this handbook is a reference for individuals and groups engaged in efforts to place minorities and women into nontraditional jobs. Under program operations and program mechanics, it outlines procedures, outreach efforts, and rationale for using the procedures.

RECRUITING WOMEN FOR TRADITIONALLY "MALE" CAREERS: PROGRAMS AND RESOURCES FOR GETTING WOMEN INTO THE MEN'S WORLD. Washington: Association of American Colleges, Project on the Status and Education of Women, 1977, 10 p. (ED 145 256) Avail from: Association of American Colleges, Project on the Status and Education of Women, 1818 R St. NW, Washington, DC 20009. Free. ...Gives a guide to resources which have been developed and used by colleges and universities in counseling and recruiting women for careers formerly considered "for men only." Parts: (1) review of programmatic approaches to recruiting women to enter traditionally "male" fields, (2) discussion of special recruiting materials, (3) list of available publications and resource groups in selected fields, and (4) list of resources for recruiting minority women.

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Strategies to Achieve Sex Equity
Strategies for Educators and Parents

ATTEMPTS TO OVERCOME SEX STEREOTYPING IN VOCATIONAL EDUCATION. Lynne Warfield and Morgan W. Lewis. University Park, PA: Institute for Research on Human Resources, 1976, 273p. Avail. from: Institute for Research on Human Resources, Penn. State Univ., 407 Kern Graduate Bldg., University Park, PA 16802. $10. . . .Surveyed and interviewed school staff and students from 11 schools with 5 or more women enrolled in nontraditional courses. Describes the various influences on the students' career decisions and makes recommendations for increasing participating in nontraditional courses.

BORN FREE: AN APPLIED DEVELOPMENTAL INTERVENTION TO REDUCE CAREER-RELATED SEX-ROLE STEREOTYPING IN ELEMENTARY, SECONDARY, AND HIGHER EDUCATION SETTINGS. L. Sunny Hansen. Paper presented at the Annual Convention of the American Psychological Association, 1977, 13p. (ED 150 492) . . .Project Born Free is a multidimensional effort to intervene in educational institutions to help reduce career-related sex-role stereotyping. This article describes the intervention programs and outlines the conceptual frameworks which underlie the project. See also: A World of Options (section C3) for a videotape from this project.

BORN FREE: A COLLABORATIVE CONSULTATION MODEL FOR CAREER DEVELOPMENT AND SEX-ROLE STEREOTYPING. L. Sunny Hansen and Dennis L. Keierleber. Personnel and Guidance Journal, Mar. 1978, 56(7): 395-399. . . . The project's goals are to create educational environments that encourage students to explore a wide range of career and lifestyle options, to facilitate personal growth for educators, and to facilitate institutional change that will expand options for both women and men. See also: A World of Option (section C3) for a videotape from this project.

CRACKING THE GLASS SLIPPER: PEER'S GUIDE TO ENDING SEX BIAS IN YOUR SCHOOLS. Mary Ellen Verheyden-Hilliard. Washington: Project on Equal Education Rights, 1978. Avail. from: PEER, 1029 Vermont Ave. NW, Washington, DC 20005. $5. . . .A kit for parents and citizens' action groups who want to check up on Title IX progress in their local schools and to press for needed changes.

EXEMPLARY STRATEGIES FOR ELIMINATION OF SEX BIAS IN VOCATIONAL EDUCATION PROGRAMS. FINAL REPORT. Shelia M. Maher. Washington: Human Resources Management, Inc., 1976, 69p. (ED 133 523) . . .Provides annotated descriptions of projects and strategies for eliminating sex bias in vocational education in four categories of resources: (1) individuals and organizations, (2) materials, (3) projects, and (4) studies.

HELP WANTED. SEXISM IN CAREER EDUCATION MATERIALS. HOW TO DETECT IT AND HOW TO COUNTERACT ITS EFFECTS IN THE CLASSROOM. Princeton, NJ: Women on Words and Images, 1975, 51p. Avail. from: Women on Words and Images, P.O. Box 2163, Princeton, NJ 08540. $2.50. . . .Summary of research on career education materials which contains (1) documentation on sex-role stereotyping in career education materials, (2) general advice to teachers and counselors on detecting and counteracting sexism in materials currently in use, (3) a teacher/ counselor activity checklist for enriching career opportunity awareness, and (4) organizations and products which are considered nonsexist sources and resources. See section D2 for companion slide program.

HOW TO ERASE SEX DISCRIMINATION IN VOCATIONAL EDUCATION. NEW YORK: WOMEN'S RIGHTS PROJECT, 1977, 77p. Avail. from: The Women's Rights Project, American Civil Liberties Union, 22 E. 40th St., New York, NY 10016. $2.50. . . .Contains information on the causes of and remedies for sex discrimination in vocational education, makes suggestions for assessing vocational education programs, and gives an analysis of the legislation.

NEW PIONEERS: A PROJECT TO ELIMINATE SEX BIAS IN OCCUPATIONAL EDUCATION--REFLECTIONS AND RECOMMENDATIONS. Amanda J. Smith. Raleigh, NC: Dept. of Public Instruction, 1977, 116p. (ED 145 192) Avail. from: Division of Equal Education, Dept. of Public Instruction, Raleigh, NC 27611. Send stamped (35¢), self-addressed, 11 x 3 envelope. Free. . . .Describes the mistakes and considerable successes of this 2 year state education agency project.

A QUALITATIVE INCREMENTAL IMPROVEMENT TO REDUCE SEX ROLE STEREOTYPING ON THE CAREER CHOICES OF JUNIOR HIGH STUDENTS. FINAL PROJECT PERFORMANCE REPORT. Linda Doyle and Robert E. Blum. Lakewood, CO: Jefferson County Public Schools, 1977, 51p. (ED 151 793) . . .Describes how "The Now and the Future," a unit that integrates career development into existing eighth and ninth grade language arts programs, was revised to reduce sex-role stereotyping in career exploration experiences and was implemented in 24 schools.

SAVE* YOUR SCHOOLS *(STRATEGIES TO ACHIEVE VOCATIONAL EQUALITY). Shelia M. Maher. Washington: Human Resources Management. 1976, 16p. (ED 131 195) . . .Lists 4 to 6 projects in each of 5 categories that were found to be successful strategies to eliminate sex bias in vocational education. Categories: (1) increasing career awareness;

(2) recruitment to nontraditional training; (3) conferences to increase commitment, concern, and activities; (4) materials development; and (5) materials review and revision.

SUGAR AND SPICE IS NOT THE ANSWER. A PARENT HANDBOOK ON THE CAREER IMPLICATIONS OF SEX STEREOTYPING. RESEARCH AND DEVELOPMENT SERIES NO. 129. Louise Vetter, et al. Columbus, OH: Center for Vocational Education, 1977, 72p. (ED 147 560) Avail. from: National Center for Vocational Education Publications, The Ohio State Univ., 1960 Kenny Rd., Columbus, OH 43210. $4.50. . . .Discusses how children's career options are limited by sex stereotyping, why it is important that they not be limited, and what parents can do about it. Suggests activities for parents in the home and community. Provides a bibliography of books, pamphlets, and magazines.

WOMEN IN APPRENTICESHIP--WHY NOT? FINAL REPORT. Patricia Mapp. Madison: Wisconsin State Dept. of Industry, Labor and Human Relations, 1973, 268p. (ED 086 880) . . .Reports on a project which attempted to isolate, analyze, and minimize barriers to the participation of women in the skilled trades through awareness campaigns, personal contacts, and surveys; describes the changes initiated because of these actions and makes recommendations for future action. Includes copies of promotional material and specific strategies for recruiting, maintaining, and placing women in apprenticeships. Also: Women in Apprenticeship--Why Not? Manpower Research Monograph No. 33. Norma Briggs. Avail. from: Supt. of Docs., U.S. Govt. Print. Off., Washington, DC 20402. 75¢. A 34-page summary of insights gained and changes catalyzed throughout the 3-year project.

WOMEN IN SCIENCE: RESHAPING THE STEREOTYPES. Deedee Pendleton. Science News, Mar. 1975, 107(11): 181. . . .Describes efforts to attract more women into the science field. Efforts include extended counseling for freshmen science majors, a role models course for freshmen women, orientation sessions for high school students, and slide-tape presentations to show outdated stereotypes wrong.

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
OCCUPATIONAL EDUCATION - SEX EQUITY

Resource List

Sex Fair Materials for Use by Teachers and Counselors

Bibliographies

COLLAGE. A Collection of Career Education Resources. Kathleen Jezierski, comp. Columbus, OH: Center for Vocational Education, 1977, 93p. (ED 145 254) . . .Catalog in 3 sections: (1) narrative of ideas for using community-based resources that offers guidelines for selecting career education materials and describes several educational resources; (2) a bibliography of "how to" career education manuals and guides on establishing resource centers, evaluating students and programs, teaching the handicapped and gifted, involving the community in career education, dealing with sex bias, providing inservice education, and career education; (3) a bibliography of curriculum materials.

FEMINIST RESOURCES FOR SCHOOLS AND COLLEGES: A Guide to Curricular Materials. Carol Ahlum and Jackie Fralley. 2d ed., rev. and enl. Old Westbury, NY: Feminist Press, 1977. Avail. from: Feminist Press, College at Old Westbury, Box 334, Old Westbury, NY 11568. $1.95. . . .Bibliography of curricular materials including sections on the student, the teacher, the counselor, health and home economics, and kits and games.

RESOURCES IN WOMEN'S EDUCATIONAL EQUITY--NON-PRINT MEDIA AND MATERIALS. Aileen Wehren. Princeton, NJ: Educational Testing Service, 1978, 243p. Avail. from: Supt. of Docs., U.S. Govt. Print. Off., Washington, DC 20402. Stock no. 017-080-01836-5. $4.25. . . . Includes films, filmstrips, transparencies, audiotapes, videotapes, records, and other instructional media relevant to women's educational equity. Divided into 6 subject categories; the one on women and work contains 79 items.

SEX ROLES: Past, Present, and Future. Prudence Leib. Washington: The Population Institute, 1975. Avail. from: The Population Institute, Organization Liaison Division, 110 Maryland Ave. NE, Washington, DC 20002. 50¢. . . .A bibliography of guides to simulations, games, and activities.

WOMEN IN NON-TRADITIONAL OCCUPATIONS--A BIBLIOGRAPHY. Koba Associates, Inc., Washington: Bureau of Occupational and Adult Education (DHEW/OE), 1976, 194p. (ED 133 460) . . .Focuses on women's employment in nontraditional fields and is intended to serve vocational education administrators, education researchers, counselors, teachers, and students considering occupational choices. Categories: (1) women in nontraditional occupations, (2) women in nontraditional skilled/vocational occupations, and (3) women in nontraditional professional occupations.

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
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Resource List

Sex Fair Materials for Use by Teachers and Counselors
Printed Classroom Materials

BEING A MAN: A UNIT OF INSTRUCTIONAL ACTIVITIES ON MALE ROLE STEREOTYPING. David Sadker. Washington: Resource Center on Sex Equity, 1977, 64 p. Avail. from: Supt. of Docs., U.S. Govt. Print. Off., Washington, DC 20402. Stock no. 017-080-01777-6. $2.10. ...Provides classroom activities for exploring masculinity and sex stereotypes, with directions for teacher and student roles.

CAREERS IN JOURNALISM FOR THE NEW WOMAN. Megan Rosenfeld. Danbury, CT: Franklin Watts, Inc., 1977. Avail. from: Franklin Watts, Inc., Sherman Turnpike, Danbury, CT 06816. $5.90. ...A Washington Post reporter produced this vocational guide which presents attitudes towards practical experience and education and examines various types of journalism careers.

THE CHOICE IS YOURS: A WOMEN'S STUDIES CURRICULUM FOR NONCOLLEGE BOUND HIGH SCHOOL GIRLS. Cynthia P. Green. Avail. from: the author, 1718 P St. NW, Washington, DC 20036. $5. ...Developed for non-college-bound eleventh and twelfth grade girls; to be used in all-girl classes such as home economics, family living, psychology, and social studies.

CURRICULUM GUIDE AND BIBLIOGRAPHY: REDUCING SEX-ROLE STEREOTYPING THROUGH CAREER EDUCATION. Kathy Quinn, comp. Bristol, CT: Bristol Career Education Program, 47 p. (ED 130 058) ...Lesson plans and bibliographies created by participants of inservice workshops conducted to heighten awareness of sex-role stereotyping and its relationship to career education.

ELIMINATING SEX BIAS IN EDUCATION. Minneapolis: Minneapolis Board of Education. Avail. from: Board of Education, Special School District 1, 807 NE Broadway, Minneapolis, MN 55413. ...Presents secondary level lesson plans for 19 topics, including career and family decisions, job characteristics, status of careers, and life cycles.

ELIMINATING SEXISM: REWRITING THE SCRIPTS. Rose M. Etheridge and Eric Rice. Chapel Hill, NC: System Sciences, Inc., 1977, 203 p. Avail. from: System Sciences, Inc., P. O. Box 2345, Chapel Hill, NC 27514. $20. ...A self-instruction package designed for all students with eighth-grade reading level or above. It requires 5 to 20 class sessions on sex stereotyping and the work force, minority groups, schools, and the law. Contains preassessment and postassessment instruments, self-check questions, and teacher materials.

EQUITY CAREER EDUCATION CURRICULUM GUIDE. Maple Heights, OH: Center for Equity Career Education. Avail. from: Maple Heights City School District, The Center for Equity Career Education, 5500 Clement Drive, Maple Heights, OH 44137. ...A curriculum guide for grades 3, 6, 8, and 10, this includes lessons, learning activities, evaluation suggestions, and recommended materials.

EXPANDING CAREER HORIZONS. Springfield, IL: Dept. of Adult, Vocational, and Technical Education, Ill. Office of Education, 1978. Avail. from: Curriculum Publications Clearinghouse, Western Ill. Univ., 76B Horrabin Hall, Macomb, IL 61455. $25. ...Materials designed for both sexes in grades 7 through 14 include 5 50-minute activity oriented lessons designed to create awareness and help eliminate sex-role stereotyping. Each lesson can stand alone and be used in a variety of vocational and non-vocational classes. A 46-page teacher's guide contains performance based objectives for students; each kit contains 1 teacher's guide and 30 sets of student materials.

A FACELIFT FOR INDUSTRIAL ARTS. Deborah D. Patterson. Man/Society/Technology, Dec. 1974, 34(3): 85-86. ...Describes a slide show depicting young women in industrial arts activities which can be used for recruiting more females into industrial arts classes. Includes script, suggestions for taking appropriate slides, and directions on putting the two together.

FOCUS ON THE FUTURE. Cleveland State Univ. Newton, MA: Education Development Center/Women's Educational Equity Act Program, 1978. Avail. from: EDC/WEEAP Distribution Center, 39 Chapel St., Newton, MA 02160. $2. ...Includes technical manual, reader's manual, and picture sets to be used with students to identify their own biases and to see how these influence career choices and family relationships.

FORTUNE TELLING: A PROGRAM FOR GIRLS ABOUT WOMEN, WORK, AND NONTRADITIONAL OCCUPATIONS. Boston: Boston Young Women's Christian Association, 1977. Avail. from: Fortune Telling Coordinator, Boston YWCA, 140 Clarendon Street, Boston, MA 02116. $7.50. ...Designed to interest girls in their working futures and to help them improve their employment projects. Includes information on setting up a program, guidelines for participants, and a student handbook.

FREE TO CHOOSE: DECISION MAKING FOR YOUNG MEN. Joyce Slayton Mitchell. New York: Delacorte Press, 1976, 272 p. Avail. from: Delacorte, Div. of Dell Publishing Co., 1 Dag Hammarskjold Plaza, 245 E. 47th St., New York, NY 10017. ...Covers many areas where young men must make choices; friendship, love, marriage, sex, and includes excellent chapters on educational choices, career decisions, and choice of a college. See also: OTHER CHOICES FOR BECOMING A WOMAN (this section) for the companion book for women.

HOW TO DECIDE: A GUIDE FOR WOMEN. Gordon P. Miller, Nelle T. Scholz, and Judith Sosebee. Princeton, NJ: College Board Publications, 1975. Avail. from: College Board Publication Order Dept., Box 2815, Princeton, NJ 08540. $5.95. ...This workbook has sections on who are you, what do you need to know, and how do you take action.

IN SEARCH OF A JOB: A SIMULATION ACTIVITY IN OCCUPATIONAL DECISION MAKING. Eric Rice, et al. Chapel Hill, NC: System Sciences, Inc., 1977, 82 p. Avail. from: System Sciences, Inc., P. O. Box 2345, Chapel Hill, NC 27514. $10. ...A group process simulation for eighth grade reading level and above that requires 6 to 15 sessions. Topics include constraints on individual choices and sex bias in the world of work, family and employer role plays, group decision-making processes, and the analysis of sex bias in job seeking activities. Package includes want ads, applications, job descriptions, family and employer descriptions, a simulation activity, an interview guide, and day-by-day instructions.

THE MASCULINE FOCUS IN HOME ECONOMICS. Judy Dowell and Bonnie Greenwood. Washington: Home Economics Education Association, 1975, 31 p. (ED 116 002) ...Explores what home economics has to offer young men and provides information on establishing and implementing a curriculum to meet the needs of today's adolescent male. Detailed suggestions for curriculum development include methods of recruitment and ideas for adapting course content and activities to the needs of males in co-educational classes.

NON-TRADITIONAL CAREERS FOR WOMEN. Sarah Splaver. New York: Julian Messner, Inc., 1973. Avail. from: Julian Messner, Inc., 8 W. 40th St., New York, NY. $5.95. ...Covers more than 500 nontraditional occupations which offer employment opportunities to women.

OTHER CHOICES FOR BECOMING A WOMAN: A HANDBOOK TO HELP HIGH SCHOOL WOMEN MAKE DECISIONS. Joyce Slayton Mitchell. New York: Delacorte, 1976, 272 p. Avail. from: Delacorte, Div. of Dell Publ. Co., 1 Dag Hammarskjold Plaza, 245 E. 47th St., New York, NY 10017. $7.95. ...Covers many of the same topics as its companion volume for men, FREE TO CHOOSE (this section), including chapters on educational and career decisions.

PLANNING AHEAD FOR THE WORLD OF WORK. Louise Vetter and Barbara J. Sethney. Columbus, OH: Center for Vocational Education, 1975. Avail. from: National Center for Research in Vocational Education Publications, The Ohio State Univ., 1960 Kenny Rd., Columbus, OH 43210. ...Teacher manual ($2.50), student materials ($1.50), complete set, including transparency masters ($4.50). A curriculum unit in 3 parts: Looking ahead to your occupation; Working women. . .who are they?; and What is my future?

PLANNING FOR FREE LIVES: CURRICULUM MATERIALS FOR COMBATING SEX STEREOTYPING IN HOME ECONOMICS, FAMILY LIVING, AND CAREER AWARENESS COURSES. Seattle: Feminists Northwest, 1975. Avail. from: Feminists Northwest, 5038 Nicklas Place NE, Seattle, WA 98105. $3.50. ...Curriculum materials for career awareness, family living, and home economics courses.

PROJECT HEAR: A UNIQUE PROGRAM IN CAREER(S) EDUCATION. Princeton, NJ: Cogent Associates, 1976, 20 p. (ED 131 270) ...Describes the field testing and evaluation of primary, intermediate, and secondary learning units which are non-sexist, ungraded, skill-building, student-centered, sequentially organized, and experiential. Conclusions reported significant effect in (1) changing stereotypical attitudes toward occupations, (2) increasing preference for sex-asynchronic occupations, (3) increasing knowledge of the world of work, and (4) increasing the consistency of occupational preference.

ROLES AND RELATIONSHIPS: A PRACTICAL GUIDE TO TEACHING ABOUT MASCULINITY AND FEMININITY. Barbara Stanford and Gene Stanford. NY: Bantam Books, 1976, 85 p. Avail from: Bantam Books, Inc., 666 Fifth Ave., New York, NY 10019. $1.75 paper. ...Helps counselors and teachers to set up courses that help students understand sex roles. Topics covered are sex and identity, myths and social pressures, sex roles and jobs, male and female differences in perceptions, and values and relationships. Includes activities and discussion topics, role-playing situations, questionnaires, and questions to be used with fiction and nonfiction reading programs.

SATURDAY'S CHILD: 36 WOMEN TALK ABOUT THEIR JOBS. Sandra Seed. New York: Bantam Books, 1974, 184 p. Avail. from: Bantam Books, 666 Fifth Ave., New York, NY 10019. $1.25. ...Includes interviews with and photographs of 36 women on their jobs in such fields as the arts, communication, science, business and government.

SEX BIAS IN CAREER EDUCATION--WHAT THE SOCIAL STUDIES TEACHER CAN DO. Judith S. Brenneke. Social Studies, May/Jun. 1978, 69(3): 96-102. ...Reports 3 activities for analyzing attitudes and investigating work motivation and occupational sex bias for use in social studies. Includes 7 things that teachers can do about career education sex bias.

SEX-STEREOTYPING, BIAS AND DISCRIMINATION IN THE WORLD OF WORK: A STUDENT HANDBOOK. Eric Rice, et al. Chapel Hill, NC: Systems Sciences, Inc., 1977, 159 p. Avail. from: Systems Sciences, Inc., P. O. Box 2345, Chapel Hill, NC 27514. $15. ...Discovery learning materials for eighth grade reading level and above; can be used to discuss what work is, beliefs about working women and men, looking for a job, and being on the job. Teacher materials include an introduction and instructions for specific activities; can be used in 5 to 45 classroom sessions.

TODAY'S CHANGING ROLES: AN APPROACH TO NONSEXIST TEACHING. Washington: Resource Center on Sex Roles in Education, National Foundation for the Improvement of Education, 1974, 108 p. Avail. from: Resource Center on Sex Roles in Education, National Foundation for the Improvement of Education, 1201 - 16th St. NW, Washington, DC 20036. $3. ...Lessons, with behavioral objectives, concepts, and student materials, including sections on: Awareness of role stereotypes; Attitudes, values, choices; and Where will I be in 5 years?

TRY IT, YOU'LL LIKE IT! A STUDENT'S INTRODUCTION TO NONSEXIST VOCATIONAL EDUCATION. Martha Matthews and Shirley McCune. Washington: Resource Center on Sex Roles in Education, National Foundation for the Improvement of Education, 1978, 57 p. Avail. from: Supt. of Docs., U.S. Govt. Print. Off., Washington, DC 20402. ...A collection of thoughts, information, and questions designed to help students explore nonsexist alternatives in vocational education. It covers working inside and outside the home, exploring individual interests, exploring vocational education, and legal rights under Title IX.

VOCATIONAL READINESS PACKAGE. Maureen Rabin and Jeanne Scott. Los Angeles: YWCA, 1971, 5 vols. Avail. from: YWCA, 1215 Lodi Place, Los Angeles, CA 90038. $25. ...Curriculum unit. Simulation games and role playing on women in marriage and careers today.

WOMEN AND THE WORLD OF WORK. A CAREER EDUCATION RESOURCE GUIDE. MINNESOTA GUIDANCE SERIES. LEARNING OPPORTUNITIES PACKAGE G. Richard J. Thoni, et al. Minneapolis: Univ. of Minnesota, 1972, 36 p. (ED 128 550) ...Helps students examine the significance of women and their relation to the world of work through the use of 7 enabling objectives and related learning experiences.

WOMEN AT WORK. Betty Medsger. Mission, KS: Sheed, Andrews, and McMeel, 1975, 212 p. Avail. from: Sheed, Andrews, and McMeel, 6700 Squibb Rd., Mission, KS 66202. $14.95 cloth, $7.95 paper. ...Depicts women at work in 188 different occupations, including many nontraditional occupations. Consists of photographs and commentaries, and can be used in individual or group reading situations.

WOMEN IN SCIENCE AND TECHNOLOGY: CAREERS FOR TODAY AND TOMORROW. Gail T. McLure. Iowa City: American College Testing Program, 1976, 16 p. Avail. from: The American College Testing Program, P. O. Box 168, Iowa City, IA 52240. $1.50. ...Specific information about careers in science and technology.

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Resource List

Assistance for Returning Women Students

CONTINUING EDUCATION: Reentry and the Mature Women--Annotated Selected References and Resources. Bibliography Series, No. 2. Kathy Cirksena, comp., et al. Bethesda, MD: Women's Educational Equity Communications Network, 1977, 26p. (ED 155 349) Avail. from: Women's Educational Equity Communications Network, 4833 Rugby Ave., Suite 205, Bethesda, MD 20014. $2 prepaid. . . .Contains 93 selected information resources in continuing education and the reentry woman, grouped into six sections: (1) overviews and bibliographies, (2) the mature woman student, (3) counseling resources, (4) program development, (5) specific programs, and (6) Women's Educational Equity Act projects.

HOW TO GO TO WORK WHEN YOUR HUSBAND IS AGAINST IT, YOUR CHILDREN AREN'T OLD ENOUGH, AND THERE'S NOTHING YOU CAN DO ANYHOW. Felice N. Schwartz, et al. New York: Simon and Schuster, 1973, 348p. Avail. from: Simon and Schuster, 1230 Ave. of the Americas, New York, NY 10020. $2.95. . . .This book is for the educated wife and mother who knows that she is underemployed, the woman who wants to lead a full life and make a contribution outside her home as well as within it--but who wonders if she should, if she can.

A MODEL TO RETRAIN WOMEN TEACHERS AND SKILLED WOMEN AS TEACHERS IN NONTRADITIONAL VOCATIONAL PROGRAMS. Rosyln D. Kane, et al. Arlington, VA: Rj Associates, Inc., 1977. Avail. from: Rj Associates, 1018 Wilson Blvd., Arlington, VA 22209. . . .Outlines a model to retrain women to become teachers of male-intensive vocational programs at the secondary level. One section details the various components essential to the design and implementation of the model by universities and state departments of vocational education.

OFF-CAMPUS EXPERIENTAL LEARNING FOR WOMEN: A MODEL PROGRAM MANUAL. Alverno College, The Research Center on Women, Milwaukee, WI. Newton, MA: Education Development Center/Women's Educational Equity Act Program, 1978. Avail. from: EDC/WEEAP Distribution Center, 39 Chapel St., Newton, MA 02160. $2.25. . . .For use when developing programs that integrate academic and off-campus work experiences for postsecondary women students.

SECOND WIND: PROGRAM FOR RETURNING WOMEN STUDENTS. Manual. Univ. of Maryland, Counseling Center, College Park, MD. Newton, MA: Education Development Center/Women's Educational Equity Act Program, 1978. Avail. from: EDC/WEEAP Distribution Center, 39 Chapel St., Newton, MA 02160. $2.75. . . .A program for returning women students which helps them improve skills, offers counseling to help with child care, money, family or personal problems, and offers information, support and friendship. For use as a guide when designing similar programs.

WOMEN AND THE WORLD OF WORK. Nancy Tobin and Barbara Lazarus Wilson. Newton, MA: Education Development Center, Inc., 1975, 63p. Avail. from: Career Education Project, Education Development Center, 55 Chapel St., Newton, MA 02160. . . .Focuses on the concerns of women who want or need to begin or resume a career. The booklet may be used to provide counselors and clients with information about the common educational and employment problems of women.

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REFERENCES

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TOWARD A NONSEXIST SCHOOL

Among a good many thoughtful and fair-minded people who have bothered to examine the instructional materials used in elementary schools today, the notion prevails that these materials are pretty sharp etching tools in stereotyping sex roles. Heightening their concern over sexism in the schools is a real bugbear of a statistic: Although instructional materials account for but one percent of school budgets, teachers report that 95 percent of their teaching time involves the use of these materials.

The criteria brought to bear in judging materials as sexist are: (1) If they demean females by using patronizing language, (2) if they omit the actions and achievements of women, and (3) if they show females and males only in stereotyped roles with less than the full range of human interests, traits, and capabilities.

The relative omission from textbooks and instructional materials of women in achieving roles and men in nurturing roles and the depiction of women in only the most restricted and dependent situations have been documented at all educational levels. Myra and David Sadker discuss these points at length in their book, Now Upon a Time: A Contemporary View of Children's Literature. As grade level increases, texts correspondingly portray a world of greater complexity and sophistication, one in which women and girls emerge less frequently and, by implication, become less significant. Moreover, minority females suffer particular exclusion, for they are pictured only half as many times as are minority males.

A comprehensive study of sexism in children's readers called Dick and Jane as Victims, published by Women in Words and Images, Princeton, New Jersey, showed that in 2,760 stories in 134 books from 15 different national publishers, boys and men outnumbered girls and women in the following ratios:

- Boy-centered stories to girl-centered stories--5:2
- Adult male main characters to adult female main characters--3:1
- Male biographies to female biographies--6:1
- Male animal stories to female animal stories--2:1
- Male folk or fantasy stories to female folk or fantasy stories--4:1

When females are presented in children's books, their most prevalent roles are more than likely those of teacher, maid, nurse, fairy godmother, and nun. They are frequently shown as emotionally and psychologically weak, passive, unachieving, unadventurous, and dominated by or subservient to admiring men and boys. Seldom is a woman depicted in any kind of job or profession, and when she is, she is usually referred to as "Miss," a not-too-shy or too-accurate suggestion that the only women in the work force are unmarried.

Source: Taking Sexism Out of Education
U.S. Govt. Printing Office, Stock No. 017-080-01794-6

Nor does the sex bias in school materials tilt only against females. Stereotyping of male characters also denies boys a full range of activities and emotions. Too often the image involves an absurdly rigid code of behavior for boys, demanding that they be consistently intelligent and brave, that they be perennial winners. They are rarely allowed the healthy release of tears, even in situations involving sickness and death. Books stress the unlimited potential of male characters, the message being that boys should aim high--become involved in adventures, aspire to prestigious occupations and to great leadership. They are rarely shown in service functions or in performing household tasks.

If any rule should apply to the acquisition and use of classroom materials, it is that everything in the environment must be appropriate for all children. Materials and activities that cannot be enjoyed freely by all children should be discarded or modified for nonsexist pedagogical use. It is a poor learning environment that teaches children they are in effect denied access to certain materials and activities. The presence of materials not clearly suitable for all children will keep alive and well the questions most youngsters have already learned to ask: Is this for boys? Is this for girls? Is this something I can do without being laughed at or called a sissy? Or a tomboy?

The most specific and potentially far-reaching response to this problem that the last few years have seen lies in the publication of guidelines by various publishing companies to ensure the future development of bias-free texts. The first enunciation of specific criteria for nonsexist materials came in 1972 with Scott Foresman's *Guidelines for Improving the Image of Women in Textbooks*. Since then, other publishing companies have drafted guidelines for eliminating bias in books.

In general, the guidelines urge that females and males should be equitably represented in instructional materials and that each sex should be presented in a manner free of bias and stereotype. Guidelines stress that females and males of all ethnic groups should be accurately portrayed in terms of character, temperament, and traits. They should exhibit a full range of human emotions and behavior and participation in all walks of life and in a wide range of occupational endeavors.

The guidelines further urge that texts presenting a historical perspective should include a fair portion of materials about or by women. Greater emphasis should be placed on social or cultural history where women have made particularly significant contributions, and texts should clearly identify the legal, economic, and social barriers of different places and times and the impact they have had on individual activity and achievement. These guidelines also emphasize the need to reflect the diversity of family life, including single-parent families, working mothers, couples without children, only children, and other patterns that do not replicate the stereotype of the family with two parents and two children, the older child a boy, the younger a girl.

One of the more difficult challenges these guidelines have taken on is to reduce the sexisms inherent in the language itself, and they specify the means to avoid such bias. Not only do they call for the elimination of biased statements about females or males, they urge strategies like the following: (1) Using universal rather than masculine terms when referring to all people (substitute humanity, person, people for the generic "man"); (2) avoiding personification of inanimate objects (eliminate the female reference to ships, cars, hurricanes); (3) avoiding the masculine pronoun to cover both sexes by substituting articles for pronouns, using the passive voice, the plural, or specifying he or she, she/he; (5) using neutral rather than masculine occupational terms (firefighter for fireman, police officer for policeman); (6) using parallel terms like women and men, girls and boys rather than men and girls to refer to male and female adults; (7) avoiding modifiers of generic occupational terms (women doctors) or feminine inflections (authoress).

In the same vein teachers' manuals are being commissioned and teachers on their own initiative are developing materials for their necessary learning. Teachers and other school personnel can also develop standards for the evaluation of sex bias in instructional materials. The California State Department of Education has set forth guidelines for eliminating sexism in school materials.

While it is essential that an effort be made to create nonsexist textbooks and materials, the problem of sexism in education extends far beyond learning materials. The teacher's behavior is probably the most critical factor in determining whether what happens in a classroom will encourage the development of flexibility and proper sex attitudes or the retention of old stereotyping practices. The "hidden curriculum" of sexist teacher-pupil interaction has been directly addressed by State University of New York psychologist Lisa Serbin, whose extensive research and videotape records indicate that both male and female preschool and elementary teachers tend to reinforce problem-solving skills in boys and dependency behavior in girls.

In one study carried out in 15 different preschool classrooms, teachers were observed to respond more often to boys' aggressive and disruptive behavior and to use more loud reprimands when scolding boys than girls. These teacher reactions to boys' antisocial behavior coincided with behavior patterns that were found actually to reinforce aggression and disruption.

The teachers were also found to reinforce "proximity-seeking" in little girls. That is to say the girls received more attention from the teacher when they were within arm's reach than when they were farther away. For boys, no such differential attention pattern was observed. Boys working across the table or in another area of the room were as likely to be reinforced by praise or instruction as those working directly under the teacher's nose. This pattern of response in teachers may result in the greater rates of proximity-seeking and the lower rates of exploration on the part of girls that have been widely reported.

Since the teachers were not aware of their different response patterns, it seems highly likely that the boys' behavior, whether social or anti-social, was somehow more conspicuous to the teachers, causing them to notice the boys more and give them more attention and instruction. Alternatively, of course, the teacher's expectations of sex-typed behavior--aggression and exploration by boys, proximity-seeking and inhibition of aggression by girls--may predispose them to notice and respond to behaviors that conform to their expectations. In other words, the teachers are likely to see the patterns they expect to find, and thus are apt inadvertently to reinforce these patterns with high rates of attention. Behaviors that are not expected, like aggression by girls, are less effective in eliciting a reaction, and thus those behaviors gradually decline.

Differential teacher response observed by Professor Serbin and others also occurred in instruction, information, and praise of classroom activities. Most striking was the disproportionate rate of detailed, step-by-step instruction in how to solve a problem or acquire a specific skill, the very instruction aimed at facilitating a child's independence. The rate of this kind of individualized instruction was more than eight times greater for boys than for girls. Instructional interactions with boys tended to be longer and more detailed as well.

Although functional sex bias often exists beneath the level of awareness, teachers can increase their consciousness of how they may affect sexist practices and how their behavior and attitudes may perpetuate sexism. One method enhancing awareness is for teachers themselves to evaluate the degree of sex discrimination and sex-role stereotyping in the school. Each teacher needs to be able to answer certain questions about her or his own behavior in the classroom. These would include questions like: Do I treat boys and girls differently? Do I expect different standards of academic performance from boys and girls, and do I award grades according to these expectations? Do I encourage certain kinds of classroom activities for boys and different kinds for girls?

Often it is difficult for people to be objective about their own behavior and attitudes. Teachers may find it useful to study videotapes of their own classroom behavior or have other teachers observe their behavior. The latter exercise would be less threatening if teachers teamed up and evaluated each other.

Planning a Nonsexist Curriculum

Educators Myra and David Sadker define three levels of concern for helping teachers confront and reduce sex stereotyping in the classroom. The first level is awareness or, as it is more often called, consciousness-raising about the forms of sexism in the curriculum--textbooks, teacher-pupil and pupil-pupil interaction. The second level is clarification, that is, helping students clarify their feelings about sexism and examine their values with regard to it. The third level is action, which can include changing some aspects of their own behavior or of their school or home environment.

Developer of a number of consciousness-raising activities is Professor Selma Greenberg. An example of a consciousness-raising activity would be to ask children to clip from magazines examples of advertisements that place one sex in occupationally stereotyped roles. Then they could be asked to make their own nonsexist advertisements for school activities and events.

Another consciousness-raising activity involves role exchange, using a classic fairy tale or a famous tall tale as the medium. In stories like "Stone Soup," "The Emperor's New Clothes," and "Little Red Riding Hood," role reversal is quite easily brought about. For instance, in the stories mentioned and in practically all fairy tales, boys, on the one hand, learn to extend themselves-to be tall, heroic, masterful. Girls, on the other hand, learn to belittle themselves--to shrink, to be quiet, to be passed merchandise from one generation to another. If good things happen to girls, it is because they have been favored by a fairy godmother or a handsome prince; girls achieve nothing material for themselves, and through joyful obedience, compliance, and service to others stronger than they and more powerful, they achieve protection and safety.

To set this record straight a teacher often need do nothing more than substitute a woman's name or the name of some girl in the class for that of the story's central male character.

Direct contact with men and women working in nontraditional fields offers a way to expand learners' awareness and to counteract the paralyzing effects of sexist curriculum materials. Although male nurses and female firefighters may be difficult to find, the effort must be made if young people are to believe that they really can be what they want to be.

That the rearing of a famly is in reality a work experience should not be overlooked in clarifying a child's feelings about sexism. Family role playing and reverse sex-role playing will afford each class member an opportunity to experience the viewpoint of the opposite sex. Children need to see their own and other children's parents as complex people with varying interests, skills, and abilities. To achieve this, teachers should encourage children to use the people at home as resources for answering questions such as: My father has fun when he ________. My mother has fun when she ________. My brother's favorite TV program is _______. My sister's favorite TV program is _______. In the same vein questions dealing with problems can be developed. In my family _____ does the cooking. Why? In my family ________ takes out the garbage. Why?

Using the completed question forms as guidelines, children may then be asked to move to level three to help bring about change in sexist home or school environments.

Fringe Free Play

Since society wastes little time in exposing children to its sexist notions and practices, it follows that youngsters need to be acquainted as soon as possible with materials that encourage nonsexist attitudes. This means the preschool level and such things as dramatic play, the housekeeping corner, doll play, and self-care, each of which may be structured to chip away at any sexist attitudes that may already have been acquired and to turn aside the acquisition of others.

The housekeeping corner, for example, is a traditional part of mainstream early-childhood environments, but it needs to be treated as a learning center if sexist behaviors are to be altered. Free play is, after all, sexist play. A romantic respect for children's "natural" desires runs through early-childhood education. This attitude gives the so-called "free play" opportunities an almost mystical reverence. There is something paradoxical in this because though most early-childhood teachers have great respect for the influence of environment of development, they have difficulty believing the child's prior learnings have bent free choice to reflect what children believe they should appropriately and properly do. Thus it is possible to honor children's choices that may grow from no more admirable motives than a fear of failure, a nervousness about participating in something new, and a sensitivity to peer disapproval.

Barbara Sprung's book *Non-Sexist Education for Young Children: A Practical Guide* offers many fine suggestions on how teachers can produce the necessarily specific nonsexist materials and indicates what commercial nonsexist material is now available. In the issue of materials, the early-childhood environment may be the most fortunate of all school environments. Teachers or older children, often under pressure to "cover" certain curricular areas, are tempted to retain the use of stereotypic sexist materials. Early-childhood educators can simply discard offensive material, since each is in most cases also the curriculum coordinator.

The Role of Parents

Parents are essential colleagues in carrying out a "de-stereotyping" program, as they are often eager to observe and contribute to the education of their children. By working together, teachers and parents can more effectively present a nonsexist educational experience to students.

In the case of sex-role stereotyping it is important that parents be made to understand the goal of providing increased options and flexibility for their children and the importance of early experiences in later career and social development. Toward this same end, one of the most significant interventions that teachers can make is to encourage cross-sex play. Work of this kind is being carried on at The Children's School in San Diego under its principal, David Ulrey.

The Resource Center on Sex roles in Education has some suggestions for parents who wish to help de-stereotype their children's education:

- Review the textbooks and materials that your children are using and identify sources of bias where they exist.

- Meet with your children's teachers and principals to learn what they are doing about expanding role options in the classroom.
- Work with other parents or groups to raise their awareness of the problem of biased materials.
- Meet with school board members to make known your concern. Support expenditures for supplementary materials and in-service training for school personnel.
- Help to organize a community workshop that makes available new nonsexist multi-ethnic books.
- Meet with local TV station officials to talk about sex-stereotyped roles.
- Help to launch a study of the bias of textbooks used in your community schools, and publicize the results along with recommendations for change.
- Help establish a special collection of books in the school or public library that features nonracist, nonsexist, and multi-ethnic books.
- Write to or meet with persons responsible for textbook selection at local and state levels to voice your concerns, urging purchase of quality materials and inclusion of supplementary materials.
- Write textbook publishers and indicate dissatisfaction with biased material. Support examples of nonracist, nonsexist books that have been developed.
- Recognize the efforts of teachers and administrators who are taking positive actions to deal with the problem.

American society is changing so rapidly that children need to be educated to develop all their cognitive, social, and physical abilities. Both boys and girls profit from a variety of activities and a broad repertoire of skills. One of the teacher's roles is to encourage their broad participation and to help develop many skills that are free of sex roles. Children who are with a teacher only one year early in their lives will live at least three-quarters of a century after they leave that classroom. The pertinent question is, will that teacher have done as much as possible toward enabling the children to continue growing and participating through those coming years?

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STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION
Occupational Education

Sex Equity

GUIDELINES FOR IMPROVING THE IMAGE OF WOMEN IN TEXTBOOKS
(Scott, Foresman and Company)

Recommendation: These guidelines may be useful in screening publications and communications for sex equity.

Sexism refers to all those attitudes and actions which demean or stereotype individuals or groups because of their sex. These guidelines focus specifically on the elimination of sexism as it relates to women in textbooks.

Whether accidentally or intentionally, women have frequently been treated as inferiors. Textbooks should treat women and men as equals. Textbooks are sexist if they omit the actions and achievements of women, if they demean women by using patronizing language, or if they show women or men only in stereotyped roles with less than the full range of human interests, traits, and capabilities. The actual role of sexism in society, past and present, should not be ignored; and, where appropriate, textbooks can discuss sexism as an important phenomenon without reflecting or reinforcing sexist bias.

GENERAL GUIDELINES FOR TEXT AND ILLUSTRATIONS

THE ACTIONS AND ACHIEVEMENTS OF WOMEN SHOULD BE RECOGNIZED.

The contributions of women to politics, the sciences, the arts, and other fields often considered exclusively masculine should be presented and explored.

The works of female authors are too often omitted from anthologies. When compiling or revising such texts, editors should actively search for material written by women.

Females should be included as often as males in math problems, spelling and vocabulary sentences, discussion questions, test items, and other exercises. Very often the overall tone of a book is sexist because males are more frequently mentioned in exercises or because the exercises present only stereotypes.

Although many factors determine the content of textbooks--authors, permissions, space, time, money, the market, etc.--these limitations should not be used to excuse bias, prejudice, or insensitivity.

WOMEN AND GIRLS SHOULD BE GIVEN THE SAME RESPECT AS MEN AND BOYS.

Writers, editors, designers, and illustrators should make sure that both male and female readers feel that a publication is directed to them.

Material should be scrutinized carefully in the context of the book as a whole to ensure that contempt for women as a group is not inadvertently being fostered. For example, writers should take care that material about a woman who is stupid, financially inept, a bad driver, a shrewish mother-in-law, a blind follower of male initiative, etc., does not present these qualities as typical of women as a group. Girls and women should not be shown as more fearful of danger, mice, snakes, and insects than boys and men are in similar situations.

Women and girls should not be shown as unworthy people when they do not conform to male standards. Males should not be viewed as having a monopoly on ability to judge what is interesting or worthwhile.

Although women are a majority of the American population, in many ways their history has been that of a minority group. Because of past discrimination, the same care must be taken in portraying women as in portraying blacks, Puerto Ricans, Chicanos, American Indians, and other minorities.

ABILITIES, TRAITS, INTERESTS, AND ACTIVITIES SHOULD NOT BE ASSIGNED ON THE BASIS OF MALE OR FEMALE STEREOTYPES.

One reason often cited for the overwhelming percentage of selections by or about males in literature and language arts texts is that boys will read only stories about boys whereas girls will read anything. If females were not depicted as passive, lackluster, sweet but senseless drudges, both boys and girls would find them more interesting. Few boys have rejected Alice in Wonderland or The Wizard of Oz because the main characters are girls.

Females as well as males possess courage, physical strength, mechanical skills, and the ability to think logically. Males as well as females can be fearful, weak, mechanically inept, and illogical. Females can be rude, intractable, active, or messy. Males can be polite, cooperative, inactive, or neat. Because such characteristics are shared by males and females in reality, textbooks that classify them as "masculine" or "feminine" are misrepresenting reality.

Both men and women should be shown cooking, cleaning, making household repairs, doing laundry, washing the car, and taking care of children. Both men and women should be shown making decisions; participating in sports; writing poetry; working in factories, stores, and offices; playing musical instruments; practicing medicine and law; serving on boards of directors; and making scientific discoveries. However, care must be taken to avoid replacing old stereotypes with new ones. Showing some women in traditional roles, such as housewife or nurse, is not sexist if women are shown in other roles as well.

Children often conform to the standards of their peers because they fear ridicule. If only boys are encouraged to be active and competitive, girls with these inclinations may learn to stifle them. If only girls are encouraged to express openly such emotions as fear, sorrow, and affection, boys may feel reluctant to express these emotions.

Both men and women have much to gain from the elimination of stereotypes. Textbooks which avoid male and female stereotyping will more accurately represent reality, encourage tolerance for individual differences, and allow more freedom for children to discover and express their needs, interests, and abilities.

RECOMMENDATIONS FOR AVOIDING SEXIST LANGUAGE

DEALING WITH THE OMISSION OF WOMEN.

Terms and titles which use man to represent humanity have the effect of excluding women from participation in various human activities. It is usually easy to find some other way of expressing the idea.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
early man	early humans, early men and women
Neanderthal man	Neanderthals, Neanderthal men and women
When man invented the wheel...	When the wheel was invented... When people invented the wheel...
History of the Black Man in America	History of Black People in America
Man and His World	World History

Occupational terms often ignore the existence of women workers. When a group includes both women and men, use a term or phrase that reflects the actual composition of the group.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
businessmen	businessmen and women, business leaders, operators of small businesses, entrepreneurs, merchants, industrialists*
congressmen	members of Congress, congressmen and women
mailmen	letter carriers
repairmen	people who repair...repairers

*Since the term businessmen is often used loosely, it may be helpful to describe the person or persons in more precise occupational terms.

A patronizing tone toward women, created by euphemisms, diminutive suffixes, and lack of parallelism, must be avoided. References to a woman's appearance, marital status, and family should not be made unless these items would be noteworthy in referring to a man in the same context.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
the fair sex, the weaker sex	women
the girls in the office	the women in the office
sculptress, suffragette	sculptor, suffragist
the ladies and the men	the women and the men, the ladies and the gentlemen
men (and women)	men and women
man and wife	husband and wife, man and woman, the couple
The works of Hemingway, Steinbeck, and Miss Buck were widely read.	The works of Hemingway, Steinbeck, and Buck were widely read.
The poetic styles of Emily Dickinson and E. E. Cummings are quite different Emily's style is spare and simple, while Cummings'...	The poetic styles of Emily Dickinson and E. E. Cummings are quite different. Dickinson's style is spare and simple, while Cummings'...
Galileo was the astronomer who discovered the moons of Jupiter. Marie Curie was the beautiful chemist who discovered radium.	Galileo was the astronomer who discovered the moons of Jupiter. Marie Curie was the chemist who discovered radium.
	Galileo was the handsome astronomer who discovered the moons of Jupiter. Marie Curie was the beautiful chemist who discovered radium.
The candidates were Bryan K. Wilson, president of American Electronics, Inc., and Florence Greenwood, a pert, blond grandmother of five.	The candidates were Bryan K. Wilson, president of American Electronics, Inc., and Florence Greenwood, credit manager for Bloominghill's department store.
	The candidates were Bryan K. Wilson, a handsome, silver-haired father of three, and Florence Greenwood, a pert, blond grandmother of five.

ELIMINATING SEX-ROLE STEREOTYPES

Editors and authors should be cautious when they assign certain activities or roles to people or otherwise differentiate between people purely on the basis of sex. Many such assumptions misrepresent reality and ignore the actual contributions of both sexes to the activity or role. This is not to say that girls should never be pictured playing with dolls or that boys should never be pictured playing with baseballs, but that a more varied picture is also a more realistic one.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
In New England, the typical farm was so small that the owner and his sons could take care of it by themselves.	In New England, the typical farm was so small that the family members could take care of it by themselves.
Children had once learned about life by listening to aunts, uncles, grandparents, and the wise men of their town or neighborhood.	Children had once learned about life by listening to aunts, uncles, grandparents, and the wise people of their town or neighborhood.
Write a paragraph about what you expect to do when you are old enough to have Mr. or Mrs. before your name.	Write a paragraph about what you would like to do when you grow up.
Personal symbols are small, personal objects or possessions that have particular associations for their owners. To a woman, for example, a pressed flower might recall a dance she attended many years ago. A boy might keep a cracked baseball bat because it reminds him of the time he hit the winning home run.	Personal symbols are small, personal objects or possessions that have particular associations for their owners. To a father, for example, an old toy truck might serve as a reminder of a boy who has grown up. A girl might keep a broken tennis racket because it reminds her a hard-won championship.
	Personal symbols...To a parent, for example, an old puppet might serve as a reminder of a girl who has grown up. A boy might keep a Halloween costume as a souvenir from his childhood.

When creating spelling, math, and other exercises using fictitious people, authors and editors should make sure that stereotypes are not perpetuated.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
Al listened patiently to the ladies chatter.	Al listened patiently while the women talked.
The ex-stenographer got a job as a stewardess with an airline.	The ex-stenographer got a degree in accounting.

Words like spokesperson and chairperson, introduced into the language to prevent the omission of women, should not be applied to women only. When -person is used, it refers to either a man or a women.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVE:
Helen Lopez will be the spokesperson for the administration, and Michael Johnson will be the spokesman for the union.	Helen Lopez will be the spokesperson for the administration, and Michael Johnson will be the spokesperson for the union.

Males or females are often chosen to represent "typical examples, thereby excluding one of the sexes from the reader's thoughts. There are many ways to avoid such stereotyping.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
the common man, the man on the street	ordinary people
the man who pays a property tax	the person who pays a property tax
the typical American...he	typical Americans...they
the teacher...she	the teacher...he or she, teachers...they
the housewife who complains about higher prices	the consumer (homemaker) who complains about higher prices

Wherever possible avoid the use of "he-him" referents. It is often preferable to use a plural sentence with plural pronouns; or substitute he or she, her or him, him/her, or a synonym for the noun. It is becoming increasingly common in all but formal usage to mix singular nouns with plural pronouns, as in the sentence "Ed and Sue were present, but neither expressed their views." Often pronouns that needlessly refer to sex can be replaced: "Ed and Sue were present, but neither expressed any views."

CHANGING LANGUAGE THAT DEMEANS WOMEN

Writers often judge women's achievements by standards different from those by which they judge men's. This is necessary in some professional sports where the same standards do not apply. However, in other areas one's sex does not affect one's competence. Therefore, writers should avoid constructions that place women in a special class. Words like girl, young woman, woman, lady, and gal often subtly denigrate women's achievements. They should be used only when their counterparts boy, young man, man, gentleman, and guy would be appropriate in referring to a male.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
Andrew Wyeth is a fine painter, and Georgia O'Keeffe is a fine woman painter.	Andrew Wyeth and Georgia O'Keeffe are fine painters.
Marie Curie did what few people--men or women could do.	Marie Curie did what few people could do.
Mary Wells Lawrence is a highly successful lady advertising executive.	Mary Wells Lawrence is a highly successful advertising executive.

Terms such as woman doctor or female executive are generally unacceptable. Where it is desirable to refer to a person's sex, references should be made with the aid of feminine pronouns: "The doctor walked into the room and put her bag on a chair next to the patient's bed." In some cases, however, it is necessary to refer directly to a person's sex, as in the sentence: "The works of female authors are too often omitted from anthologies."

Avoid constructions implying that women, because they are women, are always dependent on male initiative.

EXAMPLES OF SEXIST LANGUAGE	POSSIBLE ALTERNATIVES:
The ancient Egyptians allowed women considerable control over property.*	Women in ancient Egypt had considerable control over property. Men in ancient Egypt allowed women considerable control over property.**
A slave could not claim his wife or children as his own because the laws did not recognize slave marriages.*	Slaves tried to maintain family relationships, but the laws did not recognize slave marriages.
the farmer and his wife*	a farm couple
a homeowner and his family*	homeowners and their children

* These examples do not make sense inasmuch as terms like ancient Egyptians, slave, farmer, homeowner include women.

** This sentence would be correct only if the author could prove that men in ancient Egypt could choose to grant or deny property rights to women.

Care must be taken to avoid sexist assumptions and stereotypes in teacher's manuals and other teacher aids.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
Hammers and scissors are good eye-hand coordinators. Hitting the nail instead of the thumb is a triumph for the boys. Cutting out paper dolls and their garments is good for the girls.	Hammers and scissors are good eye-hand coordinators. For a child, hitting the nail instead of the thumb or cutting out a recognizable shape is a triumph.
The boys like action stories, and both boys and girls like animation and comedy. Girls will read stories that boys like, but the boys will not enjoy "girlish" stories.	Most children like action, animation, and comedy in stories. Some children, however, will enjoy lighter or more sentimental types of reading materials.

REVISING SEXIST MANUSCRIPTS

A manuscript may contain so many instances of sexist language that a complete revision is necessary. Following are two such selections along with possible revisions.

EXAMPLES OF SEXIST LANGUAGE:	POSSIBLE ALTERNATIVES:
Have one member of the class walk on onstage into an environment of his choosing (remembering the difference between showing and doing, be sure he does not show you where he is, but rather does what he would normally do in that place). When you are sure where he is, join him in the environment. As each member of the class discovers where he is, they in turn may join him onstage.	Imagine yourself in a particular situation. Without telling the class where you are, walk onstage into this environment. Remember the difference between showing and doing and do what would normally be done in the place you have chosen. As other class members recognize your environment, they may join you onstage, becoming a part of the same situation.
Born in Manchester, England, in 1922, the daughter of a greengrocer, Mary Barrington spent a typical girlhood doing chores around the house and reading the works of female authors such as Jane Austen and Emily Bronte. Although she was considered attractive by men and had several suitors, she rejected the joys of marriage in order to pursue a literary career. Her sharp, masculine mind attracted the attention of instructors at Queen's College where she won the coveted Queen's Prize for Literature in her final year. By 1946 Miss Barrington had become a nationally known authoress, largely due to her best-selling novel Crassington which dealt with man's alienation--a theme that recurred in the eight novels that followed. Now semiretired, she can occasionally be seen on the outskirts of Manchester, sporting the good looks and trim figure that belie her age.	Born in Manchester, England, in 1922, the daughter of middle-class parents, Mary Barrington spent a good deal of her childhood reading the works of well-known English authors such as Jane Austen and Emily Bronte. She was intent on pursuing a literary career, and her sharp mind attracted the attention of instructors at Queen's College. In her final year, she won the coveted Queen's Prize for Literature. By 1946, Barrington had become a nationally known author, largely due to her best-selling novel Crassington which dealt with human alienation--a theme that recurred in the eight novels that followed. Now semiretired, she can occasionally be seen on the outskirts of Manchester, where she leads an active life and enjoys good health.

DEALING WITH UNAVOIDABLE SEXISM

If, after careful consideration, an author or editor finds it desirable to use selections that contain sexist attitudes, these attitudes should be discussed in accompanying descriptive material or discussion questions. For example, the following questions appeared in one text after the story "The Journal of a Wife-Beater":

1. The Latins have a word for it: machismo, that flaunting of masculinity that is expected in certain male-dominated societies. To what degree does the Vasili who begins this journal seem to accept this concept of male superiority?

2. Every time Nitsa hits her husband, she states calmly, "I owed you one..." Is she, as she claims, simply repaying a debt?

3. Try your hand at writing a journal Nitsa might have kept for the days covered in the story.

Guidelines for Assessment of Sex Bias and Sex Fairness in Career Interest Inventories
National Institute of Education

I. The Inventory Itself

A. The same interest inventory form should be used for both males and females unless it is shown empirically that separate forms are more effective in minimizing sex bias.

B. Scores on all occupations and interest areas covered by the inventory should be given for both males and females, with the sex composition of norms--i.e., whether male, female, or combined sex norms--for each scale clearly indicated.

C. Insofar as possible, item pools should reflect experiences and activities equally familiar to both females and males. In instances where this is not currently possible, a minimum requirement is that the number of items generally favored by each sex be balanced. Further, it is desirable that the balance of items favored by each sex be achieved within individual scales, within the limitations imposed by validity considerations.

D. Occupational titles used in the inventory should be presented in gender-neutral terms (e.g., letter carrier instead of mailman), or both male and female titles should be presented (e.g., actor/actress).

E. Use of the generic "he" or "she" should be eliminated throughout the inventory.

II. Technical Information

A. Technical materials provided by the published should describe how and to what extent these guidelines have been met in the inventory and supporting materials.

B. Technical information should provide the rationale for either separate scales by sex or combined-sex scales (e.g., critical differences in male-female response rates that affect the validity of the scales vs. similarity of response rates that justify combining data from males and females into a single scale).

C. Even if it is empirically demonstrated that separate inventory forms are more effective in minimizing sex bias, thus justifying their use, the same vocational areas should be indicated for each sex.

D. Sex composition of the criterion and norm groups should be included in descriptions of these groups. Furthermore, reporting of scores for one sex on scales normed or constructed on the basis of data from the other sex should be supported by evidence of validity--if not for each scale, then by a pattern of evidence of validity established for males and females scored on pairs of similar scales (male normed and female normed for the same occupation).

E. Criterion groups, norms, and other relevant data (e.g., validity, reliability, item response rates) should be examined at least every 5 years to determine the need for updating. New data may be required as occupations change or as sex and other characteristics of persons entering occupations change. Text manuals should clearly label the date of data collection for criterion or norm groups for each occupation.

F. Technical materials should include information about how suggested or implied career options (e.g., options suggested by the highest scores on the inventory) are distributed for samples of typical respondents of each sex.

G. Steps should be taken to investigate the validity of interest inventories for minority groups (differentiated by sex). Publishers should describe comparative studies and should clearly indicate whether differences were found between groups.

III. Interpretive Information

A. The users manual provided by the publisher should describe how and to what extend these guidelines have been met in the inventory and the supporting materials.

B. Interpretive materials for test users and respondents (manuals, profiles, leaflets, etc.) should explain how to interpret scores resulting from separate or combined male and female norms or criterion groups.

C. Interpretive materials for interest inventory scores should point out that the vocational interests and choices of men and women are influenced by many environmental and cultural factors, including early socialization, traditional sex-role expectations of society, home-versus-career conflict, and the experiences typical of women and men as members of various ethnic and social class groups.

D. Manuals should recommend that the inventory be accompanied by orientation dealing with possible influences of factors in C above on men's and women's scores. Such orientation should encourage respondents to examine stereotypic "sets" toward activities and occupations and should help respondents to see that there is virtually no activity or occupation that is exclusively male or female.

E. Interpretive materials for inventories that use homogeneous scales, such as health and mechanical, should encourage both sexes to look at all career and educational options, not just those traditionally associated with their sex group, within the broad areas in which their highest scores fall.

F. Occupational titles used in the interpretive materials and in the interpretation session should be stated in gender-neutral terms (e.g., letter carrier instead of mailman) or both male and female titles should be presented (e.g., actor/actress).

G. The written discussions in the interpretive materials (as well as all inventory text) should be stated in a way which overcomes the impression presently embedded in the English language that (a) people in general are of the male gender and (b) certain social roles are automatically sex linked.

H. The users manual (a) should state clearly that all jobs are appropriate for qualified persons of either sex and (b) should attempt to dispel myths about women and men in the world of work that are based on sex-role stereotypes. Furthermore, ethnic occupational stereotypes should not be reinforced.

I. The users manual should address possible user biases in regard to sex roles and to their possible interaction with age, ethnic group, and social class, and should caution against transmitting these biases to the respondent or reinforcing the respondent's own biases.

J. Where differences in validity have been found between dominant and minority groups (differentiated by sex), separate interpretive procedures and materials should be provided that take these differences into account.

K. Interpretive materials for respondent and user should encourage exploratory experiences in areas where interests have not had a chance to develop.

L. Interpretive materials for persons reentering paid employment or education and persons changing careers or entering postretirement careers should give special attention to score interpretation in terms of the effects of years of stereotyping and home-career conflict, the norms on which the scores are based, and the options such individuals might explore on the basis of current goals and past experiences and activities.

M. Case studies and examples presented in the interpretive materials should represent men and women equally and should include but not be limited to examples of each in a variety of nonstereotypic roles. Case studies and examples of mature men and women and of men and women in different social class and ethnic groups should also be included where applicable.

N. Both users manuals and respondents materials should make it clear that interest inventory scores provide only one kind of helpful information, and that this information should always be considered together with other relevant information--skills, accomplishments, favored activities, experiences, hobbies, influences, other test scores, and the like--in making any career decision. However, the possible biases of these variables should also be taken into consideration.

FILE CLERK

Job Duties

File Clerks work in all type of business offices. They may work in general offices or for departments of large companies (for instance, the sales department).

The File Clerk files letters, orders, invoices, receipts, and other business records in file cabinets or drawers. She places the materials in files following the directions of her supervisor. She may file the items by subject matter, number, alphabetically by names of individuals or companies, or by a special system used by the office. The File Clerk also prepares file folders and labels when needed. She may need to sort the materials before they are filed or another office worker may do this. In some offices, she prepares indexes to items on file.

When asked, the File Clerk finds materials in the files and gives them to the person requesting them. She may keep a record of who has the items and the dates they were taken and returned. She may also clean out-dated materials from the files.

Some File Clerks are required to type and to open and deliver mail when not doing filing work. Some also act as receptionists and answer telephones. Still others are assigned to different jobs from time to time. They sometimes handle unusual or special assignments in addition to their regular filing duties.

Job Conditions

Most File Clerks work in modern, well-lighted, air-conditioned offices. They may stand for long periods of time while filing materials. There is much reaching, walking, bending, and stooping involved in this work.

Because the same operations are repeated over and over again in this work, the applicant should not mind routine work.

As soon as Bill sat down in the superintendent's office, Burns came right to the point: "Bill, you've worked in the machine shop four years--right? And before you came to us, three years at ABC Company. Let's see--you completed apprentice training there...good production and attendance record...you get on well with other men..."

Requirements

In most industries, foreman come from the ranks of the workers. In a machine shop, for example, a foreman is often chosen because he is a skilled worker with a good record. If he supervises a department where many different kinds of work are done, he is not expected to be skillful in each kind. But he must have a general understanding of all the jobs, so that he knows when the work is being done right--or wrong. He must know where to go to find the answers to problems of training workers and maintaining equipment.

Education and Training

In large industrial centers, many of which have a shortage of skilled workers, employers seek young men who will persevere through apprentice training. This is especially true in the metal-trades industries. Often young men who are mechanically inclined and not especially interested in a college-degree program can find excellent opportunities by going into industry as apprentices as soon as they graduate. They will begin to earn wages that are more than half the full journeyman's rate, and will receive training paid for by their employers.

A good work and study record as an apprentice is the first

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(7/26/79)

THE IDENTIFICATION OF OCCUPATIONAL FIELDS LIKELY TO OFFER THE GREATEST OPPORTUNITIES FOR BOTH MEN AND WOMEN

Introduction/Overview

All vocational education students, female and male, are potential beneficiaries of information on the full range of occupations present in the labor market. The goal of equality of opportunity in vocational education and employment is compromised where labor market information encourages perceptions of some fields as appropriate for women, and others as appropriate for men.

- Labor market information should be used in a manner that encourages, not discourages, the consideration of a full range of opportunities by all vocational education students.
- Labor market information should be used to provide all vocational education students, both male and female, with the same opportunties for occupational planning and decision-making.

ANALYSIS OF LABOR MARKET OPPORTUNITIES SHOULD BE APPROACHED IN SUCH A WAY THAT IT DOES NOT CONTRIBUTE TO THE PROBLEM OF OCCUPATIONAL SEX-STEREOTYPING, FOR WOMEN OR MEN

A Self-Fulfilling Prophesy

Future representation of women in the labor force is projected to be heaviest in those occupational fields in which women have traditionally been dominant.

To the extent that we accept this as inevitable, or even acknowledge the likelihood of it happening, we may be contributing to a self-fulfilling prophesy.

That is, we may be contributing to a situation in which our perceptions of the way things are likely to turn out influence the way they actually turn out.

And so:

- We must be sensitive to the subtle ways in which we can contribute to the continued heavy representation of women in traditional female fields.
- We must be sensitive to the subtle ways in which we reinforce the perception that there are, or will be, or should be, traditional female fields.
- We must be sensitive to the ways in which we serve as part of
  the problem, rather than part of the solution.

Source: Dr. May Ellis

A Balanced Perspective

It is true that attention has been drawn to sex-role stereotyping and sex bias primarily because of the problems experienced by women. While the problems of women in vocational education and employment deserve attention, and action, at this time, it is important that we develop and maintain a balanced perspective on the elimination of stereotyping and bias for both sexes.

- Both men and women may perceive opportunities for contribution and satisfaction in occupations dominated by the other sex.
- Both men and women may feel capable of success in occupations dominated by the other sex.

However--

- Both men and women may feel pressure to enter occupational fields dominated by their own sex.
- Both men and women may perceive barriers to entering occupational fields dominated by the other sex.

And so--

- Both men and women may be hurt by occupational sex-stereotyping, sex-role stereotyping, and sex bias and discrimination.

The goal is equality of opportunity in vocational education and employment for all students--for both sexes.

Keeping this goal at a high level of awareness may hold the key to analysis of labor market opportunities that does not contribute to problems of stereotyping and bias for vocational education students.

Labor Market for Men and Women

Because attention has been drawn to the problems of women in vocational education and employment, there is a tendency to ask: Where are the greatest opportunities for women in the work force?

While this is a legitimate question to raise, it must be raised with care, and addressed with care, for it does imply that labor force opportunities for women are to be examined separate from labor force opportunities for men, and that greatest opportunities for women will, or may, differ from the greatest opportunities for men.

Because only a handful of all occupations in our economy carry requirements that are sex-linked, a rationale for separate analyses of labor force opportunities for women and men is difficult to develop.

In light of this, it is probably more appropriate to ask: Where are the greatest opportunities for women and men--for all persons--in the work force?

By querying labor market opportunities in this way, two serious problems may be avoided which could undermine efforts to establish equality of opportunity for women and men in vocational education and employment.

- The first problem is the perpetuation and reinforcement of the notion that some occupations are traditional and appropriate for women; others are traditional and appropriate for men.
- The second problem is the creation of the expectation that many students--female students, in particular-will want to pursue the heretofore nontraditional occupational fields, and will not fairly assess all fields, both traditional and nontraditional, in light of their personal interests, aptitudes, abilities, and aspirations.

The danger in this latter problem lies in the promotion of nontraditionalism for the sake of nontraditionalism; the danger lies in the implication that students--especially female students--should not be satisfied with their consideration or selection of traditional occupational fields, even though these fields offer good opportunities and meet all perceived needs.

Either or both of these two problems-perpetuation of traditionalism; promotion of nontraditionalism-will arise where analyses of labor market opportunities are designed to serve women or men, and not women and men.

These problems will arise where vocational educators lose their perspective on the goal of equality of opportunity for all students.

Keeping Dominance and Traditionalism in Perspective

It should be understood that maintaining this balanced perspective on the analysis of labor market opportunities for both women and men does not imply that the realities of the labor market, as they affect both women and men, are in any way ignored or denied. For example, while many occupations are comprised of a balanced representation of men and women, most others fall into the categories of male-dominated and female-dominated. Students should be helped to view male dominance or female dominance of an occupation in the context of historical fact, and not in the context of a circumstance or condition affecting the choice of an occupation. They should be helped to recoginze that the dominance of an occupation by one sex or another is a factor to be considered in occupational planning and preparation, but that the decision to pursue an occupation is based on a number of more relevant factors.

It should also be understood that the terms "traditional" and "nontraditional," when applied to the choice of an occupation by women or men, describe historical phenomena.

Understanding the meanings of these terms is important because they are useful descriptors of the occupational choice patterns of women and men, and are commonly used.

Exercising care in the use of these terms is important because traditionalism and nontraditionalism in occupational choice are the very concepts that vocational educators must ultimately eliminate in order to ensure equality of opportunity for all students.

ANALYSIS OF LABOR MARKET DATA SHOULD BE DESIGNED TO MEET THE OCCUPATIONAL PLANNING AND DECISION-MAKING NEEDS OF BOTH WOMEN AND MEN IN VOCATIONAL EDUCATION

The Purposes of Labor Market Data

The vocational education programs offered in public school systems across the country must reflect labor market needs. Federal and state legislation require that vocational education students be prepared for occupations that are in demand in the labor market. The reasons for this are simple, and obvious.

Nationwide, the occupations present in our economy are a function of the goods and services available to, and demanded by, the public. In individual regions and locales, the occupations present are a function of the business industrial, professional, institutional, and governmental mix present in the areas, coupled with the demand for the goods and services provided by this mix of organizations. In response to fluctuations in demand for goods and services, organizations expand, contract, and relocate; and national, regional, and local labor markets change in size and composition. Vocational education's mandate to monitor the labor market serves two basic purposes.

- First, it is intended to minimize the likelihood of either oversupply or undersupply of workers in individual occupational fields in the labor market.

- Second, it is intended to provide an accurate base of information on both current and projected demands across occupational fields, for use by vocational education students engaged in occupational planning and decision-making.

In realizing these purposes, vocational educators must collect data on various facets of the labor market, both current and (projected) future.

A Key Question

Because of the concern with equality of opportunity for women and men in vocational education, a key question to be addressed is this:

Does the goal of identifying the best labor market opportunities for both women and men impose any changes in the way that the labor market is monitored, in the labor market information that is collected, or in the way the information is presented by vocational educators?

Granting a couple of important assumptions, the answer is no.

But the assumptions are important.

A Good Data Base is Assumed

The first assumption is that vocational educators are already collecting the best available labor market data, i.e., data that give the best possible picture of present and future opportunities in full range of occupations.

While there may be varied opinions on what constitutes an ideal, as well as merely adequte, labor market data base for vocational education programs, there is probably general agreement that the data base should meet the following requirements.

- It should permit students to look across occupational fields, to see and compare current demand and current earnings potential of occupations.
- It should permit students to look across occupational fields, to see and compare the growth that is projected, the replacement needs that are projected, and to the extent possible, the earnings potential that is projected for occupations.
- It should permit students to visualize the general employment trends that are projected, and the changes that are projected in the distribution of the labor force across occupational fields.
- To the extent possible (within data limitations), it should provide students with these labor market indicators for local, regional, and national labor markets, to enable them to see that the best opportunities in occupations of interest may or may not be found in their local labor market.

Proper Presentation of Data is Assumed

The second assumption is that vocational educators are already assembling labor market data in a form that does not suggest that some occupations are women's and some occupations are men's, and that vocational educators are providing the same objective information on all occupations to all students.

This is especially important at this time, because current trends in the growth of occupational fields in our economy carry implications for the planning and decision-making of both women and men in vocational education.

Recent Department of Labor data indicate projected requirements for major occupational groups (see Table I).

If projections like these hold, the distribution of all workers across major occupational groups will change.

Employment will continue to shift toward the white-collar and service areas, and away from the blue-collar and farm worker areas.

The greatest employment gains are likely to be made in the service (other than private household), clerical, and professional and technical areas.

The largest percentage shifts in the distribution of all workers in the labor force are likely to occur in these same three areas, with the clerical area continuing to employ, by far, the largest percentage of all workers.

The distribution of workers across occupational groups is projected to change as indicated in Table II.

Questions on Expectations

Among the important questions to be addressed are the following.

- Do the implications of these projections differ for women and men?
- Do we expect women and men (as groups) to interpret these data in different ways?
- Do we expect women to ignore the growth and the replacement needs in certain clerical and service fields?
- Even though growth is slowing, do we expect women to ignore the large numbers of jobs contained in the craft and kindred and the operative areas?

Our answers to these questions reflect our perceptions of the extent to which both men and women in vocational education are objective in their appraisal of all opportunities available to them in the labor market.

Our answers reflect our perceptions of the extent to which other influences, other considerations, affect their appraisal of labor market opportunities. Our answers also provide us with a brief, personal assessment of the climate for freedom of occupational choice that exists in the vocational education environment.

Finally, our answers should provide us with some direction for making needed improvements in the ways in which vocational education students are prepared to appraise labor market opportunities, and make the best possible occupational choices.

Can We Grant Assumptions?

Our two basic assumptions--that vocational educators are already collecting the best available labor market data, and that vocational educators are providing the same objective data on all occupations to all students--deserve careful examination.

If we cannot grant these assumptions, then the goal of identifying the best labor market opportunities for both women and men does impose changes in the monitoring and/or collection and/or presentation of labor market information.

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TABLE I

(Numbers in Thousands)

OCCUPATIONAL GROUP	1974 EMPLOYMENT	PROJECTED 1985 REQUIREMENTS	PERCENT CHANGE	OPENINGS, 1974-85		
				TOTAL	GROWTH	REPLACEMENTS
Total	85,936	103,400	20.3	57,600	17,400	40,200
White-collar workers						
Professional and technical workers	12,338	16,000	29.4	9,400	3,600	5,700
Managers & Admin.	8,941	10,900	21.6	5,200	1,900	3,200
Salesworkers	5,417	6,300	15.7	3,400	900	2,600
Clerical workers	15,043	20,100	33.8	16,300	5,100	11,300
Blue-collar workers						
Craft & Kindred Workers	11,477	13,800	19.9	5,100	2,300	2,800
Operatives	13,919	15,200	9.0	6,000	1,300	4,800
Nonfarm laborers	4,380	4,800	8.8	1,400	400	1,100
Service workers						
Private household workers	1,228	900	-26.7	600	- 300	900
Other service workers	10,145	13,700	34.7	10,400	3,500	6,900
Farm workers	3,048	1,900	-39.0	- 100	-1,200	1,000

TABLE II

(Numbers in Thousands)

OCCUPATIONAL GROUP	1974 EMPLOYMENT		PROJECTED 1985 REQUIREMENTS	
	NUMBER	PERCENT	NUMBER	PERCENT
Total	85,936	100.0	103,400	100.0
White-collar workers				
Professional and technical workers	12,338	14.4	16,000	15.5
Managers and administrators	8,941	10.4	10,900	10.5
Salesworkers	5,417	6.3	6,300	6.1
Clerical workers	15,043	17.5	20,100	19.5
Blue-collar workers				
Craft and kindred workers	11,477	13.4	13,800	13.3
Operatives	13,919	16.2	15,200	14.7
Nonfarm laborers	4,380	5.1	4,800	4.6
Service workers				
Private household workers	1,228	1.4	900	.9
Other service workers	10,145	11.8	13,700	13.2
Farm workers	3,048	3.5	1,900	1.8